

Switch Generation Limited ("We") are committed to protecting and respecting your privacy.

This policy (together with our terms of use and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed and stored by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting www.sochal.com and otherwise providing data to us you are accepting and consenting to the practices and our use of your personal data as described in this policy.

For the purpose of the Data Protection Act 1998 (the **Act**), the data controller is Switch Generation Limited of 6th Floor, Blackfriars House, The Parsonage, Manchester, Lancashire, M3 2JA.

Information We May Collect From You

We may collect and process the following data about you:

- **Information you give us.** You may give us information about you by filling in forms (either via registering to become a member of Sochal or otherwise) at www.sochal.com and via the interactive functions offered by the site and any related domains, mobile and desktop applications, widgets, tools, players, applications, data, software and other services (**our Services**) or by corresponding with us by phone, e-mail, social media or otherwise. This includes information which you provide when you register to use our Services, participate in discussion boards or other social media functions on our Services, enter a competition, promotion or survey, download content from our Services and when you report a problem with our Services.
- The information you give us may include your name, address, e-mail address and phone number, personal description and photograph, your device's phone number, username, password and your date of birth.

We will have to use some of this information in order to provide our Services to you when you subscribe to www.sochal.com. This includes your name, birth date, home address, email address and other information.

- You may also give us information regarding your general health and fitness status, details of any medical conditions or injuries, food likes and dislikes, your nutritional requirements, details of your health & wellbeing goals, details of your alcohol consumption and smoking habits, details of your level of self-esteem and body image and general health, fitness and wellbeing areas of interest. We will use and process such "sensitive personal data" only when you have given your explicit consent to our doing so.

You may choose to create a more detailed profile of yourself when submitting basic registration information to use our Services. Even if you do not choose to submit any such additional personal information, if your username includes or reveals your name or any other personal information, then this will be available to other users of our Services and the public.

Other Information we collect about you. With regard to each of your visits to and/or use of our Services we may automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your device to the Internet, your device's IMEI number, the MAC address of your device's wireless network interface or its mobile number, mobile network information, operating system, browser type and version your login information, browser type and version, browser plug-in types and versions, operating system and platform;

- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Services (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- **Location information.** We may also use GPS technology or Foursquare to determine your current location. Some of our location-enabled Services require your personal data for the feature to work. If you wish to use the particular feature, you will be asked to consent to your data being used for this purpose. You can withdraw your consent at any time by contacting us at info@sochal.com.
- **Information collected by advertisers:** We also allow advertisers and advertising networks to collect information about your computer or mobile device, activities, and geographic location to enable them to display targeted ads to you.
- **Information we receive from other sources.** We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers and search information providers) and may receive information about you from them.

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our Services. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy.

Uses Made of the Information

We use information held about you in the following ways:

- **Information you give to us.** We will use this information:
 - To manage your account;
 - to provide you with information about other services we offer that are similar to those that you have already purchased or enquired about;
 - to notify you about changes or improvements to our Services;
 - to ensure that content from our Services is presented in the most effective manner for you and for your device.;
 - on an anonymous basis, for research purposes and for our general business purposes
- **Information we collect about you.** We will use this information:
 - to administer our Services and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - to improve our Services to ensure that content is presented in the most effective manner for you and for your device;
 - to allow you to participate in interactive features of our Services, when you choose to do so;

- as part of our efforts to keep our Services safe and secure;
 - to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
 - to make suggestions and recommendations to you and other users of our Services about goods or services that may interest you or them.
- **Information we receive from other sources.** We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

Marketing

When you register for the Services, you will be given the opportunity to consent to receive marketing communications from us. You can choose to no longer receive marketing communication from us by updating your account settings or contacting us at info@sochal.com. We shall therefore retain your personal data in our records for marketing purposes until you notify us that you no longer wish to receive marketing communications from us.

Disclosure of Your Information

We may share your personal information with 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 share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you and we shall use our efforts to procure that such third parties only use your personal data in accordance with our instructions and applicable laws;
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others, provided that we shall not share your personal data with such networks without your consent; and
- Analytics and search engine providers that assist us in the improvement and optimisation of our Services, but we shall not share your personal data with such providers without your consent.

We may disclose your personal information to third parties:

- 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.
- If Switch Generation Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its users will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms Of Use and other agreements; or to protect the rights, property, or safety of Switch Generation Limited, our users, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection.

Where We Store Your Personal Data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Security

We take appropriate security measures (including physical, electronic and procedural measures) to help safeguard your personal data from unauthorized access and disclosure. In particular, all information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password that enables you to access certain parts of our Services, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Services; 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.

Your Rights

You have the right to obtain from us a copy of the personal data that we hold for you, and to require us to correct errors in the personal data that we process for you if it is inaccurate or incomplete. You also have the right at any time to require that we delete your personal data. To exercise these rights, or any other rights you may have under applicable laws, please contact us at info@sochal.com. Please note, we reserve the right to charge an administrative fee of £10 if you wish to obtain a copy of the personal data that we hold for you.

Third party links

Our Services may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Changes to Our Privacy Policy

Any changes we may make to our privacy policy in the future will be posted on this page. You are responsible for regularly reviewing this policy so that you are aware of any changes to it.

Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to info@sochal.com.