

PRIVACY NOTICE

Effective as of 30 April 2025.

I. INTRODUCTION

Welcome to the Spade.Fit Limited Privacy Notice (**'Notice'**).

The purpose of this Notice is to inform you about how Spade.Fit Limited ("**Spade**") collects, uses, and protects your personal data. It also outlines your rights as a data subject, identifies the relevant data controllers, and provides contact details for any questions or concerns.

It is crucial for safeguarding your privacy and ensuring that your rights are respected. By understanding our practices, you can be assured that your data is handled with care and in compliance with applicable laws.

Where required under local data protection or privacy laws, country-specific privacy information is provided in a separate notice, as applicable.

This Notice applies to individuals who:

- Visit or interact with our websites or App (**'Visitors'**), available at: www.spade.fit, on iOS or Android.
- Engage with us regarding our services or products through sales and marketing channels such as events, webinars, or other business activities (**'Prospects'**).
- Are customers or represent an organisation with which we have a commercial relationship (**'Customers'**), including those who use our applications, register for support in the Online Portal, or otherwise interact with us as business contacts.
- Collaborate with us for business purposes (**'Business Partners'**).
- Provide services to us (**'Suppliers'**).
- Contact us with any questions, complaints, comments, feedback or other inquiries (**'Others'**).

In this Notice, '**personal data**' refers to any information that can identify, relate to, describe, or reasonably be linked – directly or indirectly – to a specific individual. This does not include aggregated or de-identified data that cannot reasonably be connected to an individual.

This Notice is provided in a layered format to help you navigate specific sections easily.

TABLE OF CONTENTS

- I. [INTRODUCTION](#)
- II. [WHO WE ARE – YOUR DATA CONTROLLER](#)
- III. [HOW TO CONTACT US](#)
- IV. [THE DATA WE COLLECT ABOUT YOU](#)
- V. [HOW IS YOUR PERSONAL DATA COLLECTED](#)
- VI. [LEGAL GROUNDS FOR PROCESSING PERSONAL DATA](#)
- VII. [HOW DO WE USE YOUR PERSONAL DATA AND DATA RETENTION PERIODS](#)
- VIII. [DISCLOSURES OF YOUR PERSONAL DATA](#)
- IX. [WHICH COUNTRIES DO WE TRANSFER PERSONAL DATA TO](#)
- X. [DATA SECURITY](#)
- XI. [DIRECT MARKETING](#)
- XII. [SOCIAL MEDIA](#)
- XIII. [COOKIES AND WEB ANALYSIS](#)
- XIV. [THIRD-PARTY WEBSITES](#)
- XV. [YOUR RIGHTS AND HOW YOU MAY EXERCISE THEM?](#)
- XVI. [USE OF THE WEBSITES BY CHILDREN](#)
- XVII. [REQUESTING NOTICE IN OTHER LANGUAGES OR FORMATS](#)
- XVIII. [CHANGES TO THE PRIVACY NOTICE](#)

II. WHO WE ARE – YOUR DATA CONTROLLER

Spade is responsible for your personal data. Spade will act as the data controller for any personal data it collects and processes, including data relating to Visitors, Prospects, Customers, Business Partners, Suppliers and Others, based on its relationship with you.

Spade will act as the data controller for processing activities related to Visitors to our websites.

III. HOW TO CONTACT US

To contact us and our Data Protection Officer, please reach out to us at:

Spade.Fit Limited

137 Broadway, Bexleyheath, England, DA6 7EZ

Attn: Legal Department / Privacy

You can submit a privacy rights request [here](#).

IV. THE DATA WE COLLECT ABOUT YOU

Spade processes various types of data that can be grouped together as follows:



- **Identity data** – includes name, username.
- **Contact data** – includes company, job title, address, email address and telephone number.
- **Subscription data** – includes details of products and services you have purchased from us, card and payment information.
- **Technical data** – includes IP address, session information, your login data, unique identifier, browser type and version, time zone setting and location, language, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our websites and use our mobile apps, and other information collected through cookies (as applicable).
- **Profile data** – includes your interests, preferences, feedback and survey responses.
- **Commercial (usage) data** – includes information about how you use our website, products and services.
- **Marketing data** – includes your preferences in receiving marketing communications from us.
- **Communication data** – includes audio or video recordings, transcripts, and related metadata captured during calls, online meetings, or demos using tools such as conversation intelligence platforms.
- **Other data** – other information you may share with us.

V. HOW IS YOUR PERSONAL DATA COLLECTED

Spade collects personal data directly from you, from the entity with which you are affiliated, and through your interactions with our websites or applications. You may provide your contact details by filling out online forms, contacting us by post, phone, or email, participating in online meetings, subscribing to our publications, requesting marketing communications, providing feedback, or submitting a complaint or comment.

The type of personal data we collect depends on the products and services you use, the actions you take, and whether you submit a support request or seek further information. We collect this data either independently or through external third parties, including tracking technologies (as detailed in [Section XIII](#)).

VI. LEGAL GROUNDS FOR PROCESSING PERSONAL DATA

Spade processes personal data based on the following lawful bases:

- **Contractual necessity** – to perform a contract with you or the organisation you represent, or to take steps before entering into such a contract.

- **Legitimate interest** – to improve and develop products and services, monitor and analyse their usage, personalise user experiences, conduct research and statistical analysis, communicate with end users and provide notifications, and ensure security. We do not process personal data based on legitimate interest where the impact on you outweighs our interests unless we have your consent or are legally required to do so.
- **Legal compliance** – to fulfil legal obligations and regulatory requirements applicable to Spade.
- **Consent** – where required, we rely on your consent for purposes such as analytics, improving our services and customer interactions, training and supporting our employees, marketing, sales, and conducting user surveys. You can withdraw your consent at any time by contacting us using the details provided in [Section III](#).
- **Vital interests and public task** – in rare cases, where processing is necessary to protect someone’s life or to carry out a task in the public interest.

Each basis is applied as appropriate to the specific processing activities undertaken by Spade.

VII. HOW DO WE USE YOUR PERSONAL DATA AND DATA RETENTION PERIODS

Below is an outline detailing how we intend to use your personal data and the legal justifications on which we rely. Please be aware that we might process your personal data based on multiple legal grounds, depending on the specific purpose for which your data is being used.

Purpose	Type of data	Lawful basis for processing	Retention period
<p>To make the website available to you; administer and manage its functionality; prevent unauthorised access to restricted areas; ensure website security and protect against cyber threats; enhance your browsing experience with personalised content; support teams in coordinating email campaigns and notifications; enable event and webinar sign-up; allow content downloads and lead capture; and serve other related purposes.</p>	<p>Technical data Commercial data Marketing data Other data</p>	<p>Legitimate interests (for running our business, research, analytical and statistical improvements) Performance of a contract (governed by the Website Terms) Consent</p>	<p>Data will be retained for as long as necessary for the purpose for which it was collected, or, where based on your consent, until you withdraw your consent and in line with our defined retention period. For data collected through cookies, refer to our Cookie Notice.</p>

<p>To provide our services and products; process transactions; administer and develop our business, products, and features; ensure security; manage quality and risks; comply with legal and regulatory obligations; establish, exercise, or defend legal rights; and for historical and statistical purposes.</p>	<p>Identity data Contact data Technical data Subscription data Commercial (usage) data Marketing data Communication data Other data</p>	<p>Performance of a contract Legitimate interests Consent</p>	<p>Data will be retained for as long as necessary for the purpose for which it was collected, or, where based on your consent, until you withdraw your consent and in line with our defined retention period.</p> <p>Unless legally, contractually, or regulatorily required otherwise, we retain service-related records for up to 6 years (depending on the contracting party and data) after the termination of our engagement with your organisation plus the period until 30 January of the succeeding year.</p> <p>For data collected through cookies, refer to our Cookie Notice.</p>
<p>To set up, administer, and support your account while providing our services and products.</p>	<p>Identity data Contact data Subscription data Technical data Profile data Commercial (usage data)</p>	<p>Performance of a contract with you Legitimate interests Consent</p>	<p>Data will be retained for as long as necessary for the purpose for which it was collected, or, where based on your consent, until you withdraw your consent and in line with our defined retention period.</p> <p>Generally, data is retained for up to 6 years (depending on the contracting party and data) after our engagement with your organisation ends, plus until 30 January of the following year.</p> <p>For data collected through cookies, refer to our Cookie Notice.</p>

<p>To manage your customer experience, to maintain accurate contact data, and to offer products, services, and features, to deliver personalised communications and create recommendations based on your use of our products, services, features, and your visits on our websites and applications.</p>	<p>Identity data Contact data Subscription data Technical data Profile data Commercial (usage data) Marketing data Communication data Other data</p>	<p>Performance of a contract with you Legitimate interests Consent</p>	<p>Data will be retained for as long as necessary for the purpose for which it was collected, or, where based on your consent, until you withdraw your consent and in line with our defined retention period.</p> <p>For data collected through cookies, refer to our Cookie Notice.</p>
<p>To manage our relationship with suppliers and business partners, perform a contract, administer, manage, and develop our business and services, ensure security, quality, and risk management activities, and comply with legal and regulatory requirements, establish, exercise, or defend legal rights; and for historical and statistical purposes.</p>	<p>Contact data</p>	<p>Performance of a contract Legitimate interests Consent</p>	<p>Data will be retained for as long as necessary for the purpose for which it was collected, or, where based on your consent, until you withdraw your consent and in line with our defined retention period.</p> <p>Generally, data is retained for up to 10 years (depending on the contracting party and data) after our engagement with your organisation ends, plus until 30 January of the following year.</p>
<p>For direct marketing purposes (such as providing newsletters, information about our services and products, case studies, white papers, business analyses, event highlights, activities, promotions, etc., that you have signed up for or agreed to receive) and serve other related purposes</p>	<p>Contact data Marketing data Communication data Technical data Other data</p>	<p>Consent Legitimate interests</p>	<p>Personal data will be deleted after 2 years of inactivity or upon consent withdrawal, but essential details may be retained on our opt-out list.</p> <p>For data collected through cookies, refer to our Cookie Notice.</p>
<p>To organise events, webinars or meetings</p>	<p>Contact data</p>	<p>Consent</p>	<p>Data will be retained for as long as</p>

	Other data	Legitimate interests	<p>necessary for the purpose for which it was collected, or, where based on your consent, until you withdraw your consent and in line with our defined retention period.</p> <p>Personal data will be deleted one year after the event or meeting if no further activity occurs.</p>
To communicate with you, respond to your requests, provide the information you requested, and fulfil other related purposes.	Contact data Other data	Consent Legitimate interests	<p>We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected.</p> <p>Personal data will be deleted one year after the communication if no further activity occurs.</p>
For other legitimate business purposes.	Identity data Contact data Subscription data Technical data Profile data Commercial (usage data) Marketing and communication data Other data	Legitimate interests Consent	<p>Data will be retained for as long as necessary for the purpose for which it was collected, or, where based on your consent, until you withdraw your consent and in line with our defined retention period.</p> <p>For data collected through cookies, refer to our Cookie Notice.</p>

Change of purpose

We will only use your personal data for the purposes for which it was collected, unless we reasonably determine that another use is compatible with the original purpose.

If we need to process your personal data for an unrelated purpose, we will notify you and explain the legal basis that allows us to do so.

Please note that in certain cases, we may process your personal data without your knowledge or consent, where required or permitted by law, in compliance with applicable data protection principles.

VIII. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the following categories of third parties, located within or outside the UK and EEA (subject to specific contractual requirements), as necessary:

- **Spade:** we may transfer your personal data to other **Spade** entities in the UK, Europe, and worldwide for the purposes outlined in this Notice, particularly when collaborating to provide services. We have an intra-company agreement ensuring that international transfers within the Spade comply with applicable data protection laws.
- **Authorised Spade representatives** – individuals responsible for commercial activities and contractual performance who interact with you.
- **Third party service providers** – including professional advisers, auditors, consultants, agents, vendors, and suppliers offering services such as IT and system administration, hosting, research, analytics, marketing, targeted advertising, training, certifications, data backup, security, and storage. These services are performed under the purposes and legal bases outlined in this Notice.
- **Law enforcement, government, or regulatory agencies** – as required by applicable laws or regulations.

This list is non-exhaustive; there may be additional instances where we need to share personal data to provide services efficiently or comply with legal obligations.

When engaging third parties, we take all necessary steps to ensure they implement appropriate technical and organisational measures to protect your personal data and uphold its confidentiality.

IX. WHICH COUNTRIES DO WE TRANSFER PERSONAL DATA TO?

To effectively deliver our services, we may transfer your personal data beyond the jurisdiction where it was provided, including transfers within and outside the UK and EEA. When transferring data outside these regions, we implement appropriate safeguards to ensure its protection and security in compliance with applicable data protection laws.



Our agreements with third-party service providers processing data outside the UK and EEA typically include EU Standard Contractual Clauses (SCCs) or the UK International Data Transfer Agreement (IDTA) to maintain adequate data protection standards.

X. DATA SECURITY

We have implemented appropriate security measures to prevent your personal data from being accidentally lost, misused, accessed without authorisation, altered, or disclosed. Additionally, we have established procedures to manage suspected data breaches and will notify you and any applicable regulators where legally required.

To ensure data security, accuracy, and integrity, we employ a range of physical, electronic, and managerial safeguards, including:

- employees training to ensure awareness of privacy obligations.
- Administrative and technical controls to restrict access to personal data on a need-to-know basis.
- Technological security measures, such as firewalls and anti-virus software.
- Physical security controls, including employees' security passes for facility access.
- Data security measures:
 - Encryption of personal data both in transit and at rest to prevent unauthorised access.
 - Regular security audits and vulnerability assessments to identify and mitigate potential risks.
 - Implementation of access controls and authentication mechanisms to ensure only authorised personnel can access sensitive data.

While we take appropriate security measures once we receive your data, no data transmission over the internet (including email) is entirely secure. We strive to protect personal data but cannot guarantee absolute security against all threats.

XI. DIRECT MARKETING

With your consent, we may send you marketing emails to keep you informed about our activities. You may also receive personalised social media advertising. If you have previously used our services or products and have not objected, we may inform you about other relevant services of interest based on our legitimate interest.

You can opt out of marketing messages at any time by:

- Clicking the '*unsubscribe*' link at the bottom of any marketing email.
- Submitting a privacy rights request [here](#).

Once you opt out, we will update your profile to stop marketing messages. However, you will continue to receive communications directly related to our services.

XII. SOCIAL MEDIA

Please note that we currently have the accounts on:

- **LinkedIn | Spade.Fit Limited**, which privacy policy can be found [here](#).
- **Instagram | @Spade.Fit**, which privacy policy can be found [here](#).
- **TikTok | @Spade.Fit**, which privacy policy can be found [here](#).
- **YouTube | @Spade-Fit**, which privacy policy can be found [here](#).

XIII. COOKIES AND WEB ANALYSIS

Cookies are small text files stored on your device when you visit a website. They help us improve your browsing experience, analyse site traffic, and personalise content.

Our website uses different types of cookies. Some cookies are placed by third party services that appear on our pages:

- **Necessary cookies** help make the website usable by enabling basic functions like page navigation and access to secure areas. The website cannot function properly without these cookies.
- **Preference cookies** enable the website to remember information that changes the way the website behaves or looks, like your preferred language or the region that you are in.
- **Statistic cookies** help us to understand how visitors interact with websites by collecting and reporting information anonymously.
- **Marketing cookies** are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third-party advertisers.
- **Unclassified cookies** are cookies that we are in the process of classifying, together with the providers of individual cookies.

You have the right to control how cookies are used on your device. You can:

- Manage cookie preferences through our cookie banner.
- Disable cookies via browser settings (e.g., Chrome, Firefox, Safari).
- Opt-out of third-party tracking (such as Google Analytics) via their respective settings.

Note: disabling certain cookies may impact website functionality.

You can learn more and manage your cookie settings by clicking the



XIV. THIRD-PARTY WEBSITES

Our websites may contain links to third-party websites, plug-ins, applications, information sources, and related party websites. Clicking on these links or enabling such connections may allow third parties to collect or share data about you. Please note that these third-party websites have their own privacy policies, which we do not control or take responsibility for. We recommend reviewing their privacy policies before providing any personal data.

XV. YOUR RIGHTS AND HOW YOU MAY EXERCISE THEM?

You have the following rights under data protection law. To exercise any of these rights, please complete this [form](#). We will respond within one month and may request proof of identification to verify your request. If needed, we may also contact you for additional information to expedite our response.

In most circumstances we will provide you a copy of your personal information free of charge. However, we may charge a reasonable fee to cover administrative costs if we believe your request is manifestly unfounded, excessive or if you ask for further copies of your information following a request. In circumstances where we are charging a fee, the one-month time limit does not begin until the fee is received.

– ***Right to access the personal data we hold about you***

You have the right to confirm whether we process your personal data and, if so, to access it.

– ***Right to rectification***

If you believe that any personal data we hold about you is incorrect or incomplete, you have the right to request its correction or completion.

– ***Right to erasure ("Right to be forgotten")***

In certain circumstances, you may request the deletion of your personal data. This right is not absolute and applies only if:

- The data is no longer necessary for the purposes for which it was collected.
- You withdraw your consent and there is no other legal basis for processing.
- You object to the processing, and there are no overriding legitimate grounds.
- Your personal data has been unlawfully processed.

Some exceptions apply, such as where processing is necessary for legal obligations, freedom of expression, or the establishment, exercise, or defence of legal claims.

– ***Right to restrict processing***

You may ask us to temporarily suspend processing of your personal data in the following cases:

- You contest its accuracy.
- Processing is unlawful, but you prefer restriction over deletion.

- You need the data for legal claims, even if we no longer require it.
 - You have objected to processing, and we are verifying whether we have overriding legitimate grounds.
- **Right to withdraw consent**

Where processing is based solely on your consent (such as for marketing communications), you have the right to withdraw your consent at any time. Upon withdrawal, we will stop processing your personal data for that purpose.

- **Right to data portability**

You may request that we transfer your personal data to you or a third party in a structured, commonly used, machine-readable format. This right applies only to automated data processing based on your consent or a contract.

- **Right to lodge a complaint**

If you are dissatisfied with how we process your personal data, please contact us first, and we will make every effort to resolve your concern promptly.

- **UK Residents:** You may also lodge a complaint with the [Information Commissioner's Office](#).
- **EEA Residents:** You may file a complaint with your local data protection authority ([list available here](#)).

XVI. USE OF THE WEBSITES BY CHILDREN

Our websites are not intended for children, and we do not knowingly collect data relating to children.

XVII. REQUESTING NOTICE IN OTHER LANGUAGES OR FORMATS

You may be able to request this Notice in another language where we provide such notices in the ordinary course of business or in an alternative format if you have a disability. Please **contact us** to request an alternative format.

XVIII. CHANGES TO THE NOTICE

We regularly review this Notice and may update it to comply with changes in applicable laws or regulatory requirements. Amendments take effect once incorporated into this Notice, and the latest version will always be available on our websites. Where practicable, we will notify you by email of significant changes. However, we encourage you to review this Notice periodically to stay informed about how we process your personal data.