



Website privacy notice

These terms of use relate to The Joy Club website.

We collect information in two different contexts, which are all dealt with in this privacy notice. The two contexts of data collection are:

1. A visitor to our website can sign-up to become a member; and,
2. A visitor to our website can purchase a number of months of Premium membership as a gift for another person.

In both contexts, we take the privacy, including the security, of personal information we hold about you seriously. This privacy notice is designed to inform you about how we collect personal information about you and how we use that personal information. You should read this privacy notice carefully so that you know and can understand why and how we use the personal information we collect and hold about you.

We may issue you with other privacy notices from time to time, including when we collect personal information from you. This privacy notice is intended to supplement these and does not override them.

We may update this privacy notice from time to time. This version was last updated on 11th August 2022.

1. Who are we and our contact details

1.1. We are Juniper Jean Ltd (trading as The Joy Club). We're a company registered in England and Wales with company number 12328518 whose registered address is at Keynsham House, 33 Bath Road, Keynsham, BS31 1SL. In these terms we refer to ourselves as "we", "us", "our" or "ourselves". We are the Data Controller of the personal information we collect, hold and use about you, as explained in this notice.

1.2. You can get hold of us by email hello@thejoyclub.com or by telephone 0808 169 6460. Please note: Calls to 0808 numbers are free when calling from a UK landline. Charges may apply when using a mobile phone or when calling from abroad.

1.3. We have appointed Hannah Thomson as our data protection officer. You can contact her using the details set out in 1.2.

1.4. In case you need it, our VAT number is 346474088.

2. Key definitions

The key terms that we use throughout this privacy notice are defined below, for ease:

2.2. Data Controller: under UK data protection law, this is the organisation or person responsible for deciding how personal information is collected and stored and how it is used.

2.3. Data Processor: a Data Controller may appoint another organisation or person to carry out certain tasks in relation to the personal information on behalf of, and on the written instructions of, the Data Controller. (This might be the hosting of a site containing personal data, for example, or providing an email-marketing service that facilitates mass distribution of marketing material to a Data Controller's customer base.)

2.4. Personal Information: in this privacy notice, we refer to your personal data as 'personal information'. 'Personal information' means any information from which a living individual can be identified. It does not apply to information that has been anonymised.

2.5. Special Information – certain very sensitive personal information requires extra protection under data protection law. Sensitive data includes information relating to health, racial and ethnic origin, political opinions, religious and similar beliefs, trade union membership, sex life and sexual orientation and also includes genetic information and biometric information.

3. Details of personal information that we collect and hold about you

3.1. Set out below are the general categories and in each case the types of personal information that we collect, use and hold about you:

Context of data collection: 1. A visitor to our website can sign-up to become a member.		
General category	Types of Personal Data in that category	Retention Periods
Contact information	This is information relating to your contact details such as email address, addresses, telephone numbers.	You provide us with this information when you become a member. We will retain this information during your membership. We use Twilio's SendGrid, Mailchimp, Mailchimp Transactional and Customer.io to send emails. By providing this information you are giving us consent to provide SendGrid and Mailchimp with your contact details and they will use this information to process email communications. Please follow this link to view SendGrid's Privacy Policy: https://www.twilio.com/legal/privacy .

		<p>Please follow this link to view Mailchimp’s Privacy Policy: https://mailchimp.com/legal/privacy/</p> <p>Should you decide to deactivate your membership account, we will retain this information for one year. If your account is deactivated for a continuous period of one year, we will delete this information about you. If you do not log into your account for a continuous period of one year, we will delete this information about you.</p>
Identity information	This is information relating to your identity such as your name (including any previous names and any titles that you use), profile photo, gender, marital status and date of birth.	You provide us with this information when you become a member. We will retain this information during your membership. Should you decide to deactivate your membership account, we will retain this information for one year. If your account is deactivated for a continuous period of one year, we will delete this information about you. If you do not log into your account for a continuous period of one year, we will delete this information about you.
Account information	This is information relating to your account with us (including username and password).	You provide us with this information when you become a member. We will retain this information during your membership. Should you decide to deactivate your membership account, we will retain this information for one year. If your account is deactivated for a continuous period of one year, we will delete this information about you. If you do not log into your account for a continuous period of one year, we will delete this information about you.
Payment information	This is information relating to the methods by which you provide payment to us (such as credit or debit card details) and details of any payments (including amounts and dates)	You may provide us with this information if you become a Premium member or pay to attend one of our events. All payments are facilitated through third-party payment processor Stripe, Inc. and they will use this information to process payments made on our site. By providing this information, you are giving us consent to initiate a one-off payment or a series of payments on your behalf. You authorise us to send instructions to the financial institution that issued your card to take payments from your card account in accordance with the terms of your agreement with us.

	that are made between us.	
Marketing information	This is information relating to your marketing and communication preferences. This includes your desired frequency of emails summarising activities of likely interest, as well as what your interests are.	You provide us with this information when you become a member. We will retain this information during your membership. Should you decide to deactivate your membership account, we will retain this information for one year. If your account is deactivated for a continuous period of one year, we will delete this information about you. If you do not log into your account for a continuous period of one year, we will delete this information about you.
Website, device and technical information	This is information about your use of our website and technical data which we collect (including your IP address, the type of browser you are using and the version, the operating system you are using, details about the time zone and location settings on the device and other information we receive about your device.	We use Amplitude, Google Analytics, Hotjar and Segment to collect this information. This analytics information is automatically collected when you use the platform. We will retain this information for up to 14 months. Please follow this link to see how Google uses data when you use our site: http://www.google.com/policies/privacy/partners/ .

Context of data collection: 2. A visitor to our website can purchase a number of months of Premium membership as a gift for another person.		
General category	Types of Personal Data in that category	Retention Periods

<p>Contact information</p>	<p>This is information relating to your contact details such as email address, addresses, telephone numbers; and the contact details of the gift recipient, should you choose to enter these.</p>	<p>You will provide your name and email address when you purchase the Premium gift membership, so that we can send you the gift voucher. You may also provide the gift recipient's name and email address if you choose for them to receive the gift voucher directly.</p> <p>We use Mailchimp Transactional to send emails. By providing this information you are giving us consent to provide Mailchimp with your contact details and they will use this information to process email communications. Please follow this link to view Mailchimp's Privacy Policy: https://mailchimp.com/legal/privacy/</p> <p>We will retain this information in order to keep record of your purchase and resolve any potential issues relating to the purchase. We will retain this information for a year, in line with the expiry period of a Premium gift membership.</p>
<p>Payment information</p>	<p>This is information relating to the methods by which you provide payment to us (such as credit or debit card details) and details of any payments (including amounts and dates) that are made between us.</p>	<p>You provide us with this information when you purchase a Premium gift membership. All payments are facilitated through third-party payment processor Stripe, Inc. and they will use this information to process payments made on our site. By providing this information, you are giving us consent to initiate a one-off payment or a series of payments on your behalf. You authorise us to send instructions to the financial institution that issued your card to take payment from your card account in accordance with the terms of your agreement with us.</p>

4. Details of special information that we collect and hold about you

4.1. Special information is explained in section 2 above. We do not collect nor hold any special information about you.

4.2. We do not collect information from you relating to criminal convictions or offences.

5. Details of how and why we use personal information

5.1. We are only able to use your personal information for certain legal reasons set out in data protection law. There are legal reasons under data protection law other than those

listed below; but, in most cases, we will use your personal information for the following legal reasons:

1. Contract Reason: this is in order to perform our obligations to you under a contract we have entered into with you;
2. Legitimate Interests Reason: this is where the use of your personal information is necessary for our (or a third party's) legitimate interests, so long as that legitimate interest does not override your fundamental rights, freedoms or interests;
3. Legal Obligation Reason: this is where we have to use your personal information in order to perform a legal obligation by which we are bound; and
4. Consent Reason: this is where you have given us your consent to use your personal information for a specific reason or specific reasons.

5.2. So that we are able to provide you with services in relation to the two contexts indicated above, we will need your personal information. If you do not provide us with the required personal information, we may be prevented from supplying the services to you.

5.3. It is important that you keep your personal information up to date. If the information we have about you (highlighted at 3.1.) changes, then please let us know or update it yourself where possible. If you do not do this, then we may be prevented from supplying the services to you.

5.4. Where we rely on consent for a specific purpose as the legal reason for processing your personal information, you have the right under data protection law to withdraw your consent at any time. If you do wish to withdraw your consent, please contact us using the details set out at the beginning of this notice. If we receive a request from you withdrawing your consent to a specific purpose, we will stop processing your personal information for that purpose, unless we have another legal reason for processing your personal information – in which case, we will confirm that reason to you.

5.5. We have explained below the different purposes for which we use your personal information and, in each case, the legal reason(s) allowing us to use your personal information.

Context of data collection: 1. A visitor to our website can sign-up to become a member.	
Purpose	Legal Reason(s) for using the personal information
To onboard and support you in our membership community.	Consent Reason: By signing up to become a member and providing us with your personal information, you are consenting to joining The Joy Club membership community. You can deactivate your membership account at any time and we

	<p>will retain your information for one year. See section 3.</p> <p>Legitimate Interests Reason: In order to allow you to log into and manage your account, understand your interests, improve our offerings, or to offer you other goods, services and/or digital content which helps us to develop our business.</p>
<p>To contribute to our membership community and interact with other members.</p>	<p>Consent Reason: By submitting reviews, posts, comments or other content (including images and other multimedia) to the website, you are consenting to providing us with those personal submissions. You are also consenting to other members of The Joy Club being able to view your submissions, first name, last name and profile photo. These details are provided by you when you create your member account and these can be updated at any time.</p> <p>Legitimate Interests reason: In order to allow you to contribute to the Community, communicate and interact with The Joy Club and other members.</p>

<p>Context of data collection: 2. A visitor to our website can purchase a number of months of Premium membership as a gift for another person.</p>	
<p>Purpose</p>	<p>Legal Reason(s) for using the personal information</p>
<p>To facilitate you buying a block of Premium membership as a gift.</p>	<p>Consent Reason: By opting to buy a block of Premium membership as a gift, you are consenting to us using your personal information for this purpose.</p>

<p>Context of data collection: 1 and 2. We will use cookies to collect analytical data (website, device and technical information) for any visitor to our website.</p>	
<p>Purpose</p>	<p>Legal Reason(s) for using the personal information</p>

<p>To help us better understand our users' needs and to optimise this service, we use Amplitude, Google Analytics, Hotjar and Segment for some of our website analytics.</p>	<p>Consent Reason: By using our website, you are consenting to us using cookies collecting this information. These technology services help us better understand our users' experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our service with user feedback. The information will be used to help us to improve our websites and protect them from abuse.</p>
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5.6. Sometimes we may anonymise personal information so that you can no longer be identified from it and use this for our own purposes. In addition, sometimes we may use some of your personal information together with other people's personal information to give us statistical information for our own purposes. Because this is grouped together with other personal information and you are not identifiable from that combined data we are able to use this. For example, when talking to potential partners, advisors or other parties, we might like to say that 'X% of our members attend an event on a monthly basis and the most popular type of event is in the Y category, with Y category making up X% of event attendance'. For the avoidance of doubt, we would not be naming you, including your information or talking about your activity in a way that would make you personally identifiable.

5.6.1. A specific example of using 'statistical information for our own purposes' (at 5.6.) is to demonstrate the impact of a partnership with The Joy Club to current and prospective partners. Sometimes we work with partners to promote The Joy Club to the partner's customers. Such partnerships can take several forms, including but not limited to: a partner might pay for membership to The Joy Club on behalf of their customers for a particular time period; a partner might pass on a special offer, including but not limited to a discount on membership fees to The Joy Club, to their customers; a partner might promote The Joy Club in its standard form. We might anonymise data and also group anonymised data from a customer who was referred by a particular partner together with data from other customers referred by the same partner, to give us statistical information. Because this is grouped together with other personal information and you are not identifiable from that combined data we are able to use this. For example, when talking to a partner, we might like to say that 'X many of your customers have signed up to The Joy Club and Y% have booked an event; your customers' favourite event category is Z; and the highest number of events attended in a month by a single person was A'. We might share statistical information like this in ways including but not limited to a conversation, an email and in an analytics dashboard populated with real-time and/or historic data. For the

avoidance of doubt, we would not be naming you, including your information or talking about your activity in a way that would make you personally identifiable.

5.6.1.1. With regards to the set-up of these partnerships (described at 5.6.1.), we and the partner remain independent parties. Our relationship is between you (as a member of The Joy Club) and us (Juniper Jean Ltd, trading as The Joy Club) and it is governed by this Website Privacy Notice, our Website Terms of Use and our Member Terms and Conditions, all of which you can access here: <https://www.members.thejoyclub.com/terms>

5.7. Under data protection laws, we can only use your personal information for the purposes we have told you about, unless we consider that the new purpose is compatible with the purpose(s) we told you about. If we want to use your personal information for a different purpose that we do not think is compatible with the purpose(s) we told you about, then we will contact you to explain this and what legal reason is in place to allow us to do this.

6. Details about who personal information may be shared with

6.1. We may need to share your personal information with other organisations or people. These organisations include:

1. Other companies in our group (who may act as joint data controllers or as data processors on our behalf) and who describe the services they provide that require them to have access to personal information, e.g. IT services, or describe the reasons it may be shared with them, e.g. for management reporting.
2. Third parties who are not part of our group. These may include:
 1. Suppliers: such as IT support services, payment providers, administration providers and marketing agencies;
 2. Government bodies and regulatory bodies: such as HMRC and fraud prevention agencies;
 3. Our advisors: such as lawyers, accountants, auditors and insurance companies.
3. Any organisations that propose to purchase our business and assets, in which case we may disclose your personal information to the potential purchaser.

6.2. Depending on the circumstances, the organisations or people who we share your personal information with will be acting as either Data Processors or Data Controllers. Where we share your personal information with a Data Processor, we will ensure that we have in place contracts that set out the responsibilities and obligations of us and them, including in respect of security of personal information.

6.3. We do not sell or trade any of the personal information that you have provided to us.

6.4 Please find a list of our third party providers below.

Third party	Purpose	Type
SendGrid	Send email communications to members.	Data processor
Mailchimp, Mailchimp Transaction	Send email communications to members.	Data processor
Customer.io	Send email communications to members.	Data processor
Google Analytics and Hotjar	Collect analytical data to help us understand how you use our website and improve our system for our users.	Data processor
Stripe	Process payments.	Data processor
Cloudinary	Securely store photos or images provided by members.	Data processor
Segment	Collect analytical data to help us understand how you use our website and improve our system for our users.	Data processor
Amplitude	Collect analytical data to help us understand how you use our website and improve our system for our users.	Data processor

7. Details about transfers to countries outside of the EEA

7.1. If any transfer of personal information by us will mean that your personal information is transferred outside of the EEA, then we will ensure that safeguards are in place to ensure that a similar degree of protection is given to your personal information as is given to it within the EEA and that the transfer is made in compliance with data protection laws (including, where relevant, any exceptions to the general rules on transferring personal information outside of the EEA that are available to us – these are known as ‘derogations’ under data protection laws). We may need to transfer personal information outside of the EEA to other organisations within our group or to the third parties listed above in section 6 who may be located outside of the EEA.

7.2. The safeguards set out in data protection laws for transferring personal information outside of the EEA include:

- a. where the transfer is to a country or territory that the EU Commission has approved as ensuring an adequate level of protection;
- b. where personal information is transferred to another organisation within our group, under an agreement covering this situation, which is known as 'binding corporate rules';
- c. having in place a standard set of clauses that have been approved by the EU Commission;

- d. compliance with an approved code of conduct by a relevant data protection supervisory authority (in the UK, this is the Information Commissioner's Office (ICO));
- e. certification with an approved certification mechanism;
- f. where the EU Commission has approved specific arrangements in respect of certain countries, such as the US Privacy Shield, in relation to organisations that have signed up to it in the USA.

8. Details about how long we will hold your personal information

8.1. We will only hold your personal data for as long as necessary. We have set out above the details of our retention periods for different types of data. You can find them in section 3.

9. Automated decision making

9.1. 'Automated decision making' is where a decision is automatically made without any human involvement. Under data protection laws, this includes profiling. 'Profiling' is the automated processing of personal data to evaluate or analyse certain personal aspects of a person (such as their behaviour, characteristics, interests and preferences).

9.2. Data protection laws place restrictions upon us if we carry out any automated decision making (including profiling) that produces a legal effect or similarly significant effect on you.

9.3. We do not carry out any automated decision making (including profiling) that produces a legal effect or similarly significant effect on you. If we do decide to do this then we will notify you and we will inform you of the legal reason we are able to do this.

10. Your rights under data protection law

10.1. Under data protection laws, you have certain rights in relation to your personal information, as follows:

1. Right to request access: (this is often called 'subject access'). This is the right to obtain from us a copy of the personal information that we hold about you. We must also provide you with certain other information in response to these requests to help you understand how your personal information is being used.
2. Right to correction: this is the right to request that any incorrect personal data is corrected and that any incomplete personal data is completed.
3. Right to erasure: (this is often called the 'right to be forgotten'). This right only applies in certain circumstances. Where it does apply, you have the right to request us to erase all of your personal information.

4. Right to restrict processing: this right only applies in certain circumstances. Where it does apply, you have the right to request us to restrict the processing of your personal information.
5. Right to data portability: this right allows you to request us to transfer your personal information to someone else.
6. Right to object: you have the right to object to us processing your personal information for direct marketing purposes. You also have the right to object to us processing personal information where our legal reason for doing so is the Legitimate Interests Reason (see section 4 above) and there is something about your particular situation that means that you want to object to us processing your personal information. In certain circumstances, you have the right to object to processing where such processing consists of profiling (including profiling for direct marketing).

10.2. In addition to the rights set out in section 10.1, where we rely on consent as the legal reason for using your personal information, you have the right to withdraw your consent.

10.3. If you want to exercise any of the above rights in relation to your personal information, please contact us using the details set out at the beginning of this notice. If you do make a request, then please note:

1. we may need certain information from you so that we can verify your identity;
2. we do not charge a fee for exercising your rights unless your request is unfounded or excessive; and
3. if your request is unfounded or excessive, then we may refuse to deal with your request.

11. Marketing

11.1. You may receive marketing from us about The Joy Club and other goods and services that we may think will be of interest to you, where either you have consented to this, or we have another legal reason by which we can contact you for marketing purposes.

11.2. However, we will give you the opportunity to manage how or if we market to you. In any email that we send to you, we provide a link to either unsubscribe or opt out, or to change your marketing preferences. To change your marketing preferences, and/or to request that we stop processing your personal information for marketing purposes, you can always contact us on the details set out at the beginning of this notice.

11.3. If you do request that we stop marketing to you, this will not prevent us from sending communications to you that are not to do with marketing. For example, operational emails are not marketing emails and will be sent to you if you have not consented to marketing emails. Operational emails are important for you to receive in relation to your use of The Joy Club platform. An example of an operational email is an email used to reset your password.

11.3.1. We have taken the view that our onboarding emails are operational emails. By onboarding emails, we mean the emails that members receive during their free trial of The Joy Club to help them understand The Joy Club platform, services and membership. If you would like us to stop sending you onboarding emails during your free trial, you can contact us on the details set out at the beginning of this notice and then we will turn off the onboarding emails if you so wish us to.

11.4. We do not pass your personal information on to any third parties for marketing purposes.

12. Complaints

12.1. If you are unhappy about the way that we have handled or used your personal information, you have the right to complain to the UK supervisory authority for data protection, which is the Information Commissioner's Office (ICO). We would be grateful if you could contact us in the first instance if you wish to raise any queries or make a complaint in respect of our handling or use of your personal information, so that we have the opportunity to discuss this with you and to take steps to resolve the position but you are not obliged to do so. You can contact us using the details set out at the beginning of this privacy notice.

13. Third-party websites

13.1. Our website may contain links to third-party websites. If you click and follow those links, then these will take you to the third-party website. Those third-party websites may collect personal information from you and you will need to check their privacy notices to understand how your personal information is collected and used by them.

14. Law and jurisdiction

14.1. Any dispute or claim arising out of or in connection with this Privacy Notice or its subject matter or formation shall be governed by and construed in accordance with the law of England and Wales and, by you becoming a member of The Joy Club, we both agree respectively that proceedings will be brought in the English courts.