

INNPULSE LTD

PRIVACY NOTICE

Last updated: July 2026

Innpulse Ltd (“Innpulse”, “we”, “us” or “our”) respects your privacy and is committed to protecting your personal information.

This Privacy Notice explains what personal information we collect, why we collect it, how we use it, who we may share it with, how long we keep it and the rights you have in relation to your personal information.

This Privacy Notice applies to members, prospective members, trial participants, website visitors and other individuals who interact with Innpulse.

1. WHO WE ARE

For the purposes of UK data-protection law, the data controller is:

Innpulse Ltd

Company number: 16473179

Registered office: AW House, 6–8 Stuart Street, Luton, LU1 2SJ

Studio/contact address: 7 Reedsdale, Luton, Bedfordshire, LU2 9TG

Email: luton@innpulse.co.uk

Telephone: 01582 354660

If you have questions about this Privacy Notice, how we use your information or wish to exercise your data-protection rights, please contact us using the details above.

2. WHAT PERSONAL INFORMATION WE COLLECT

The information we collect depends upon your relationship with Innpulse and the services you use.

Identity and Contact Information

- your name;
- email address;
- telephone number;
- address;
- date of birth where required;
- emergency contact information where provided; and
- membership or account identifiers.

Membership Information

- membership type;
- membership start and end dates;
- appointment and attendance history;
- bookings;
- cancellations and missed appointments;
- membership freezes;
- membership status;
- communications relating to your membership; and
- information relating to changes or cancellation of your membership.

Payment Information

We may process information necessary to administer membership payments, including payment status, payment dates, transaction information, Direct Debit status, payment mandate information and limited payment information made available to us by our membership and payment providers.

Payments and Direct Debits may be processed using third-party providers including LegitFit and Stripe.

We do not ordinarily retain complete bank-account information separately from our payment/payment-management providers. Where Innpulse temporarily collects bank-account information directly for a payment-system migration, additional safeguards apply as described in Section 13.

Health and Fitness Information

Because we provide EMS and fitness services, we may collect information relating to general health, medical conditions relevant to exercise or EMS, injuries, operations or procedures, pregnancy, medication where relevant to safe participation, physical limitations, exercise history, fitness goals, training information, body composition, physical measurements, fitness progress and other health or fitness information you provide that is relevant to safe and appropriate training.

Health information is special-category personal data and receives additional protection under data-protection law.

Visbody and Assessment Information

Where you use our Visbody assessment services, information may include weight, body-fat information, muscle measurements, body-composition information, posture-related information, physical measurements, assessment results and progress information. Some information generated through these assessments may constitute health data.

Communications

We may process communications you have with us through email, WhatsApp, telephone, website or online forms, social-media messages, LegitFit, HubFit and other communication methods you choose to use.

CCTV Images

CCTV operates at our studio premises and may capture images of members, visitors, staff and other individuals entering or using areas covered by the system. Further information is provided in Section 15.

3. HOW WE COLLECT YOUR INFORMATION

We may collect information directly from you when you join or purchase a membership or trial; through LegitFit, HubFit, Visbody and Stripe; when you complete health screening or an EMS safety declaration; during consultations, training or assessments; through our website and online forms; through email, WhatsApp and social-media messages; when you telephone or speak to us in person; through CCTV; and from service providers where reasonably necessary to administer your membership.

4. WHY WE USE YOUR INFORMATION

We may use personal information to respond to enquiries; set up and administer memberships; provide EMS and fitness services; manage bookings and appointments; communicate about memberships and services; collect and administer payments; manage cancellations and freezes; conduct EMS health screening; assess whether EMS or exercise is appropriate and safe; adapt training; provide coaching; monitor fitness and body-composition progress; provide Visbody assessments; provide HubFit services; maintain appropriate records; investigate complaints; protect members, staff, premises and property; prevent or investigate crime or serious incidents; establish, exercise or defend legal claims; comply with legal and regulatory obligations; and send marketing where legally permitted.

We will not use personal information for a new purpose that is incompatible with the purpose for which it was originally collected unless permitted by law.

5. OUR LAWFUL BASES

Contract

We process information where necessary to take steps at your request before entering into a membership agreement or to perform our membership agreement with you. This includes membership administration, bookings, providing membership services and administering payments.

Legal Obligation

We process information where necessary to comply with legal obligations that apply to Innpulse.

Legitimate Interests

We may process information where necessary for our legitimate interests or those of another person, provided those interests are not overridden by your rights and interests. These may include operating and administering our business, customer service, protecting our premises and systems, maintaining records, preventing and investigating misuse or fraud, improving services and establishing, exercising or defending legal claims.

Consent

For certain processing, we may rely upon your consent. Where we rely upon consent, you can withdraw it at any time. Withdrawal does not affect the lawfulness of processing that took place before consent was withdrawn.

6. HEALTH AND SPECIAL-CATEGORY DATA

Information concerning your health is classified as **special-category personal data**.

We process this information because appropriate health screening is important to the safe delivery of EMS and exercise services.

Before processing special-category information, we identify an appropriate lawful basis under Article 6 of the UK GDPR and an appropriate condition under Article 9 of the UK GDPR.

For health information provided for EMS screening, fitness assessments, coaching and safe delivery of our services, we may rely upon your **explicit consent under Article 9(2)(a)** where appropriate.

Where we rely upon explicit consent, we will request it clearly and separately. You may withdraw consent where processing relies upon consent.

However, if we cannot lawfully process health information reasonably required to determine whether EMS can be provided safely, we may be unable to provide some or all EMS services.

Health information will only be accessible to people who reasonably require access for the relevant purpose.

7. EMS HEALTH SCREENING

Members may be required to complete an EMS health and safety screening or declaration before participating.

Health information may be used to assess suitability for EMS; identify potential contraindications; identify circumstances requiring medical clearance; modify or postpone training; support safe exercise programming; and maintain appropriate records concerning safe delivery of our services.

Members are responsible for providing accurate information and notifying us of relevant changes to their health.

We do not sell health information.

8. LEGITFIT

We use **LegitFit** as our CRM/member-management system. LegitFit may process information necessary to create and manage member accounts, administer memberships, manage bookings, record membership status, facilitate member communications, support payment administration and provide other member-management functionality.

9. STRIPE AND DIRECT DEBITS

We use **Stripe** in connection with payment processing and Direct Debit arrangements.

Stripe may process information including name, contact information, bank or payment information, payment mandate information, transaction information and payment status.

Depending upon the particular processing activity, Stripe may process personal information on our behalf and may also process information for its own legal, regulatory, security and payment-processing purposes.

We do not sell payment information.

10. HUBFIT

We use **HubFit** to support our coaching and member services. Depending upon the services you use, HubFit may contain or process contact information, fitness information, goals, training information, progress information, check-ins and health-related information provided as part of coaching.

We limit information processed through HubFit to information reasonably required to provide the relevant service.

11. VISBODY

We use **Visbody** technology for body-composition and physical assessments.

Visbody may process information generated through an assessment, including measurements, body-composition information, posture-related information and progress information.

We use this information to provide body-composition assessments, assist with goal setting, monitor progress, support training decisions and provide fitness-related feedback.

Where this information constitutes health information, it is treated as special-category personal data.

12. EMAIL, WHATSAPP AND SOCIAL MEDIA

Members and prospective members may choose to communicate with us through email, WhatsApp or social-media platforms.

We may use these channels to answer enquiries, communicate about bookings, provide customer service, discuss memberships and respond to messages initiated by you.

We recommend that members do **not** send bank-account details, passwords or unnecessary sensitive health information through ordinary email, WhatsApp or social-media messages.

Where we need particularly sensitive information, we may direct you to a more appropriate collection method.

Social-media platforms and messaging providers may process information independently under their own privacy arrangements.

13. TEMPORARY DIRECT DEBIT MIGRATION

Where Innpulse temporarily needs to collect existing members' banking information directly for the purpose of migrating payment arrangements to a new membership/payment system, additional safeguards apply.

- banking information will be collected using an approved secure method;
- used solely for the payment migration/setup;
- only accessible to authorised personnel who need it;
- not used for marketing;
- not unnecessarily copied into spreadsheets, emails, WhatsApp or other systems;
- transferred into the relevant payment/membership system as soon as reasonably practicable; and
- securely deleted from the temporary collection system once successful payment setup has been confirmed, unless retention is required by law.

We may retain a limited administrative record showing that the migration was completed and when the temporary information was deleted. That record will not contain complete bank-account information unless there is a lawful and necessary reason to retain it.

14. WEBSITE AND ONLINE FORMS

When you use our website or submit an online form, we may collect information that you voluntarily provide, such as your name, contact information, enquiry details, membership interests and information necessary to respond to your request.

Our website or technology providers may also process technical information necessary to operate and secure the website.

Where cookies or similar technologies require consent, appropriate choices will be provided in accordance with applicable law.

15. CCTV

CCTV operates at our studio premises for the legitimate purposes of protecting the safety and security of our members, staff, visitors, premises and property, and to assist with the prevention or investigation of incidents where necessary.

CCTV is not routinely monitored or reviewed. Recorded footage will normally only be accessed where there is a legitimate reason to do so, for example following a reported security, safety or other significant incident.

Access to CCTV footage is restricted to authorised persons.

Where appropriate and permitted by law, footage may be disclosed to relevant third parties, such as law-enforcement authorities, insurers or legal advisers, where this is necessary in connection with an incident, investigation or legal claim.

Our CCTV system automatically overwrites older footage as storage capacity is reached. We do not intentionally retain routine CCTV footage indefinitely.

We will periodically review the system's recording and storage settings and maintain an appropriate retention period based upon the purpose for which the CCTV is operated.

Where particular footage is required in connection with an incident, complaint, investigation, insurance matter or legal claim, that footage may be retained for longer where necessary and lawful.

Appropriate CCTV signage is displayed at the premises to inform individuals that CCTV recording is taking place.

Individuals captured by our CCTV may have data-protection rights in relation to footage containing their personal information. Requests can be made by contacting luton@innpulse.co.uk.

16. WHO WE SHARE INFORMATION WITH

We do not sell personal information.

Where reasonably necessary, personal information may be shared with or processed through organisations including LegitFit, Stripe, HubFit, Visbody, website/hosting/online-form providers, email and communications providers, IT/software providers, professional advisers, banking/payment providers, law-enforcement authorities, regulators and other authorities where disclosure is required or permitted by law.

Where an organisation processes information on our behalf, we take appropriate steps to ensure suitable data-protection arrangements are in place where required. We seek to disclose only information reasonably necessary for the relevant purpose.

17. INTERNATIONAL DATA TRANSFERS

Some technology and service providers may process or store information outside the United Kingdom.

Where personal information is transferred internationally, we take appropriate steps to ensure the transfer complies with applicable UK data-protection law. Depending upon the circumstances, this may include relying upon UK adequacy regulations or approved contractual safeguards.

You may contact us for further information about safeguards applying to international transfers of your information.

18. HOW WE PROTECT YOUR INFORMATION

We use appropriate technical and organisational measures designed to protect personal information from unauthorised access, accidental loss, destruction, alteration, inappropriate disclosure and unlawful processing.

Depending upon the system and information involved, measures may include password protection, multi-factor authentication, encryption, access restrictions, secure payment providers, limiting access according to business need, appropriate staff procedures, secure deletion and keeping systems and devices appropriately protected.

No electronic system can guarantee absolute security, but we aim to apply safeguards appropriate to the nature and sensitivity of the information being processed.

19. HOW LONG WE KEEP INFORMATION

We do not keep personal information for longer than reasonably necessary. Retention periods vary according to the information and why we hold it.

When determining an appropriate retention period, we consider why the information was collected, whether it remains necessary to provide services, legal and regulatory obligations, tax and accounting requirements, insurance requirements, potential legal claims, the sensitivity of the information and whether it can safely be deleted or anonymised.

Temporary banking information collected solely for a Direct Debit migration will be securely deleted after the migration and payment setup have been successfully completed and verified, unless there is a legal requirement to retain particular information.

CCTV footage is automatically overwritten as storage capacity is reached, unless particular footage needs to be retained for a legitimate incident, complaint, investigation, insurance matter or legal claim.

We periodically review information and securely delete or anonymise information that is no longer required.

20. MARKETING

Membership and service communications are different from marketing.

We may contact you where necessary regarding appointments, membership administration, payments, cancellations, safety matters, important service changes and services you have requested.

Where required by law, we will obtain appropriate consent before sending electronic direct marketing.

You may unsubscribe from marketing communications at any time. Withdrawing from marketing will not prevent us from sending communications reasonably necessary to administer an active membership or provide a service you have requested.

21. YOUR DATA-PROTECTION RIGHTS

Depending upon the circumstances, you may have the right to:

- be informed about how we use your personal information;
- request access to personal information we hold about you;
- request correction of inaccurate or incomplete information;
- request deletion of information in certain circumstances;
- request restriction of processing in certain circumstances;
- object to certain processing;
- request transfer of certain information in a portable format;
- withdraw consent where processing is based upon consent; and
- raise a complaint about how your information has been handled.

These rights are not absolute and may be subject to legal exemptions or conditions.

To exercise a data-protection right, contact luton@innpulse.co.uk. We may need to verify your identity before responding.

Your Right to Object

Where we process your personal information on the basis of legitimate interests, you have the right to object to that processing in certain circumstances. You also have the right to object at any time to the use of your personal information for direct marketing.

22. DATA-PROTECTION COMPLAINTS

If you believe that we have not handled your personal information appropriately, please contact us at luton@innpulse.co.uk.

We will acknowledge receipt of a data-protection complaint within **30 days**, take appropriate steps to investigate it without undue delay, keep you appropriately informed and communicate the outcome without undue delay.

You also have the right to complain to the **Information Commissioner's Office (ICO)**, the UK's independent regulator for data protection.

23. DATA BREACHES

We maintain procedures for responding to suspected personal-data breaches.

Where a breach occurs, we will assess the nature and potential consequences of the incident and take appropriate action.

Where legally required, we will notify the Information Commissioner's Office and/or affected individuals within the applicable legal timescales.

24. CHILDREN'S INFORMATION

Our EMS membership services are primarily intended for individuals who meet our applicable participation requirements.

Where we provide services to a person under 18, we will take appropriate steps concerning parental or guardian involvement and the handling of the young person's personal information according to their age, capacity, the nature of the service and applicable law.

We will not knowingly use children's personal information for purposes incompatible with the reason it was collected.

25. CHANGES TO THIS PRIVACY NOTICE

We may update this Privacy Notice from time to time to reflect changes in our services, systems, information processing, business operations or applicable law and regulatory guidance.

Where a change materially affects how we use personal information, we will take reasonable steps to bring the change to the attention of affected individuals where appropriate.

The latest version of this Privacy Notice will show the date on which it was last updated.

26. CONTACT US

For privacy enquiries, data-protection requests or complaints, contact:

Innpulse Ltd

Company number: 16473179

Registered office: AW House, 6–8 Stuart Street, Luton, LU1 2SJ

Studio/contact address: 7 Reedsdale, Luton, Bedfordshire, LU2 9TG

Email: luton@innpulse.co.uk

Telephone: 01582 354660

PRIVACY ACKNOWLEDGEMENT

By providing personal information to Innpulse, you acknowledge that you have been provided with or given access to this Privacy Notice explaining how your information is handled.

Where Innpulse requires your consent for a specific processing activity — including explicit consent for particular processing of health information where applicable — that consent will be requested separately and will not be treated as automatically given simply because you have received this Privacy Notice.