## GDPR – Personal Information processed by MobilePro

## What is Innovatise’s Role

Innovatise provide Gladstone with their myFitApp solution for MobilePro. The solution is integrated with Plus2 to provide a native booking module and other features to your members. The contract between Gladstone and Innovatise identifies Innovatise as a Data Sub-processor of personal information.

Innovatise have published their GDPR information here:

<https://www.myfitapp.com/myfitapp-and-the-gdpr/>

## What personal information is processed by MobilePro

The MobilePro solution processes the personal information of:

* Cockpit users – typically you or your staff that log in into the cockpit
* App users – typically your members, your users and their friends

The categories of processing Innovatise have defined are currently:

1. Anonymous app usage

In apps without native app login, we process data on how the app is used but we cannot identify the user.

Examples: App ID, app opens, clubs selected, opt-ins, phone type, model, OS, app version, modules opened, articles viewed or shared, notifications received

1. Identified app usage

If the user logs in to the native app login, we process the user personal info which then includes their app usage data.

Examples: In addition to the information processed in Anonymous app usage, we process app users member ID & profile info (name, email, gender, member type, age, member start/end, status) retrieved from the member management system.

1. Lead Generation

We process the personal info of the referrer and any leads.

Examples: Referrer info, referrals made, lead info if they provide it, lead status.

1. Class and Activity Booking

Requires native app login. We process booking transactions.

Examples: Bookings, booking status & history, favourites, cancellations, shares.

1. Local Marketing

We process the location of the phone through beacons or QR scans

Examples: Phone location, QR scans, beacon events.

1. Web cockpit usage

We process details of gym staff using the web cockpit

Examples: Cockpit users name, email, cockpit usage.

1. Development and support services

We process details of cockpit users and app users data in the course of developing, testing and supporting the MobilePro app solution.

Examples: All of the above.

## Reasons for processing

The reasons for processing this information are:

1. Operational

We need to process this information to make our apps as easy to use as possible and provide functionality that our users find useful. To make this work, we have to process personal information. For example:

* In apps for gym chains that cover multiple clubs, it’s annoying for users to have to search for and find their club every time they use the app. We therefore store the club to make it easier for them.
* In the Class Booking module users can store favourite classes which makes it quicker and easier for them to book in the following weeks.
1. Product Improvement

The success of our apps depends on allowing app users to get access to relevant information in the most useable way possible. We process personal information to understand how app users are using our apps, what features are used most often and what user journeys are seldom used. By making changes to app content and features we and gym content providers can improve the product. For example:

* By storing information on which articles are most read, and which least read, gym content editors can learn what topics users are interested in and focus on them.
* By surveying app users in the app, we and gym content editors can get valuable feedback from app users on which parts of the app they like and which we should improve.
* By measuring the proportion of all bookings that are made in the app relative to other ways of booking, gyms can understand the benefits the app is bringing in freeing up staff for more productive duties than handling telephone bookings.
1. Marketing

We process this information to allow us to market relevant products and services to customers. Marketing is in accordance with the PECR and the GDPR and governed by opt-ins from app user. By basing our marketing on personal information, we can increase the relevance of content provided to users, so they receive offers that they are interested in. For example:

* In marketing by club, we can ensure it reaches only app users that have expressed an interest in that club.
* By telling only app users that we know have booked classes about changes to class timetables, we can avoid disturbing members who only use the fitness centre or pool.
* We can avoid disturbing members if we send joining offers only to casual users

## Third Parties used by Innovatise

Innovatise are preparing an addendum to our Gladstone contract with naming their third parties. They use well-known, established companies that have comprehensive data management and data security policies and procedures:

1. Subcontractors

Innovatise work with a small number of subcontract companies who act as data sub-processors while providing the following services:

* Software development and testing
* IT systems operations and security
* Technical and customer support
* Sales and marketing
1. Service Providers

Innovatise use the following services which necessitate sharing information:

* Internet-based customer software development support services
* Internet hosting services
* Apple services for processing Push Notifications to iOS devices
* Google services for processing Push Notifications to Android devices

## Data Retention

Personal information is retained until we are told it is no longer required. A support request should be raised to Gladstone to request anonymisation.