

**Effective 25<sup>th</sup> May 2018**

## **INTRODUCTION**

This privacy notice provides you with details of how we collect and process your personal data through your use of our site <http://theartofcoaching.co.uk>.

Please read this Privacy Policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle your Personally Identifiable Information in accordance with our website.

By using this website, you indicate your acceptance of all terms of this Privacy Policy. If you do not agree to this policy, please do not use our websites. Your continued use of any <http://theartofcoaching.co.uk> website following the posting of changes to these terms indicates your acceptance of those changes.

We take children's privacy very seriously. This website should only be accessed by persons eighteen (18) years or older.

The Art of Coaching Limited is the data controller and we are responsible for your personal data (referred to as "we", "us" or "our" in this Privacy Policy).

We have appointed a Data Protection Officer who is in charge of privacy related matters for us. If you have any questions about this privacy notice, please contact the Data Protection Officer using the details set out below:

### **Contact Details**

Full name of legal entity: The Art of Coaching Limited

Name of our Data Protection Officer: Lorna Shaw

Email address: [Lorna@theartofcoaching.co.uk](mailto:Lorna@theartofcoaching.co.uk)

Postal address: 34 Sir Johns Road, Selly Park, Birmingham B29 7ER

Phone number: +44(0) 7789 202254

## **TYPES OF PERSONAL INFORMATION WE COLLECT ABOUT YOU**

Personally Identifiable Information means any information capable of identifying an individual. It does not include anonymised data.

We may process the following categories of Personally Identifiable Information about you:

## **LOGS AND ANALYTICS**

As is true with most websites and services delivered over the Internet, we gather certain information and store it in log files when you interact with our website and services. This information includes internet protocol (IP) addresses as well as browser type, internet service provider, URLs of referring/exit pages, operating system, date/time stamp, information you search for, locale and language preferences, identification numbers associated with your devices, your mobile carrier, and system configuration information.

We collect analytics information when you use the website to help us improve the website and the services we provide. We may also share anonymous data about your actions on our website with third-party service providers of analytics services.

## **COOKIES AND OTHER TRACKING TECHNOLOGIES**

We and our authorised partners may use cookies and other information gathering technologies for a variety of purposes. These technologies may provide us with personal information, information about devices and networks you utilise to access our website, and other information regarding your interactions with our website.

We use cookies to provide you with the ability to purchase and securely access to our products and services. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Web beacons, tags and scripts may be used on our Websites or in email or other electronic communications we send to you. These assist us in delivering cookies, counting visits to our Websites, understanding usage and campaign effectiveness and determining whether an email has been opened and acted upon. We may receive reports based on the use of these technologies by our third-party service providers on an individual and aggregated basis.

## **INFORMATION THAT YOU PROVIDE US**

We collect information you send us through various channels of communications such as: website forms, social media pages, email, text.

If you request to receive information or contact us by signing up through our website forms you will be required to provide information such as your name, email and phone number.

If you purchase a product or service from us, we request certain personal information from you on our order form. You must provide contact information (such as name, email, and shipping address) and financial information (such as credit card information and expiration date). We use this information for billing purposes, to fill your orders and to keep records of such transactions. If we have trouble processing an order we will use this information to contact you.

## **SENSITIVE DATA**

We do not collect any Sensitive Data about you. Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, criminal convictions and offences, information about your health and genetic and biometric

## **GOOGLE ANALYTICS**

We use Google Analytics Advertiser Features to optimize our business. Advertiser features include:

- Remarketing with Google Analytics
- Google Display Network Impression Reporting
- DoubleClick Platform Integrations
- Google Analytics Demographics and Interest Reporting

By enabling these Google Analytics Display features, we are required to notify our website visitors by disclosing the use of these features and that we and third-party vendors use first-party cookies (such as the Google Analytics cookie) or other first-party identifiers, and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together to gather data about your activities on our website. Among other uses, this allows us to contact you if you begin to fill out our check-out form but abandon it before completion, with an email reminding you to complete your order. The “Remarketing” feature allows us to reach people who previously visited our website, and match the right audience with the right advertising message.

You can opt out of Google’s use of cookies by visiting Google’s ad settings, and you may opt out of a third-party vendor’s use of cookies by visiting the [Network Advertising Initiative opt-out page](#).

## **FACEBOOK**

As advertisers on Facebook and through our Facebook page, we (not Facebook) may collect content or information from a Facebook user and such information may be used in the same manner specified in this Policy. You consent to our collection of such information.

We abide by Facebook’s Data Use Restrictions.

- Any ad data collected, received or derived from our Facebook ads (“Facebook advertising data”) is only shared with someone acting on our behalf, such as our service provider. We are responsible for ensuring that our service providers protect any Facebook advertising data or any other information

obtained from us, limit our use of all of that information, and keep it confidential and secure.

- We do not use Facebook advertising data for any purpose (including retargeting, commingling data across multiple advertisers' campaigns, or allowing piggybacking or redirecting with tags), except on an aggregate and anonymous basis (unless authorised by Facebook) and only to assess the performance and effectiveness of our Facebook advertising campaigns.
- We do not use Facebook advertising data, including the targeting criteria for a Facebook ad, to build, append to, edit, influence, or augment user profiles, including profiles associated with any mobile device identifier or other unique identifier that identifies any particular user, browser, computer or device.
- We do not transfer any Facebook advertising data (including anonymous, aggregate, or derived data) to any ad network, ad exchange, data broker or other advertising or monetisation related service.

## **WHAT WE DO WITH YOUR INFORMATION**

We may use the information we collect about you (including personal information, to the extent applicable) for a variety of purposes, including to:

- (a) provide, operate, maintain, improve, and promote our products and services;
- (b) enable you to access and use our services;
- (c) process and complete transactions, and send you related information, including purchase confirmations and invoices;
- (d) send transactional messages, including responses to your comments, questions, and requests; provide customer service, support and administrative messages;
- (e) send promotional communications, such as providing you with information about products and services, features, surveys, newsletters, offers, promotions, contests, and events; and provide other news or information about us and our partners.

You can opt-out of receiving marketing communications from us by contacting us at [info@theartofcoaching.co.uk](mailto:info@theartofcoaching.co.uk) or following the unsubscribe instructions included in our marketing communications;

- (f) monitor and analyse trends, usage, and activities in connection with the website and Services and for marketing or advertising purposes;
- (g) investigate and prevent fraudulent transactions, unauthorised access to our services, and other illegal activities;
- (h) personalise the website and services, including by providing features or advertisements that match your interests and preferences; and
- (i) for other purposes for which we obtain your consent.

## **DISCLOSURES OF YOUR PERSONAL INFORMATION**

As a general rule, we will not share, sell, rent or trade your data with third parties without your permission. However, there are some important exceptions to this rule that are described in the following paragraphs.

We may, in our sole discretion, provide information about you as required by law and when we believe that disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order, or other legal process for purposes of fraud investigations, alleged intellectual property infringement, or any other suspected illegal activity or matters that may expose us to legal liability.

Although we do not disclose individually identifiable information, we may disclose aggregate data about our website's visitors to advertisers or other third parties for marketing and promotional purposes.

We share information, including personal information, with our third-party service providers that we use to provide hosting for and maintenance of our website, application development, backup, storage, payment processing, analytics and other services for us. These third-party service providers may have access to or process your personal information for the purpose of providing these services for us. We do not permit our third-party service providers to use the personal information that we share with them for their marketing purposes or for any other purpose than in connection with the services they provide to us.

We share personal information with the International Coaching Federation (ICF) as part of the accreditation requirement for our coaches. The information we share with the ICF includes your name, email and possibly phone number. However, before we share your information with the ICF, we will obtain your prior written authorisation. You have the right to withhold your consent.

## **HOW LONG WE RETAIN YOUR PERSONAL INFORMATION**

We will retain your personal information for as long as is needed to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## **INTERNATIONAL TRANSFERS**

Countries outside of the European Economic Area (**EEA**) do not always offer the same levels of protection to your personal data, so European law has prohibited

transfers of personal data outside of the EEA unless the transfer meets certain criteria.

Many of our third parties service providers are based outside the European Economic Area (**EEA**) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is in place:

- We will only transfer your personal data to countries that the European Commission have approved as providing an adequate level of protection for personal data by; or
- Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or
- If we use US-based providers that are part of EU-US Privacy Shield, we may transfer data to them, as they have equivalent safeguards in place.

If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

## **DATA SECURITY**

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also allow access to your personal data only to those employees and partners (including associates and sub-contractors) who have a business need to know such data. They will only process your personal data on our instructions and they must keep it confidential.

When you enter sensitive information (such as a credit card number) on order forms that are hosted by our PCI compliant third-party service providers, the transmission of that information is encrypted using secure socket layer technology (SSL).

## **ADDITIONAL RIGHTS FOR EEA AND CERTAIN OTHER TERRITORIES:**

If you are from certain territories (such as the EEA), you may have the right to exercise additional rights available to you under applicable laws, including:

- Right of erasure: In certain circumstances, you may have a broader right to erasure of personal information that we hold about you – for example, if it is no longer necessary in relation to the purposes for which it was originally collected. Please note, however, that we may need to retain certain information for record keeping purposes, to complete transactions or to comply with our legal obligations.

- Right to object to processing: You may have the right to request that we stop processing your personal information and/or to stop sending you marketing communications.
- Right to restrict processing: You may have the right to request that we restrict processing of your personal information in certain circumstances (for example, where you believe that the personal information we hold about you is inaccurate or unlawfully held).
- Right to data portability: In certain circumstances, you may have the right to be provided with your personal information in a structured, machine readable and commonly used format and to request that we transfer the personal information to another data controller without hindrance.

If you would like to exercise such rights, please contact us at [info@theartofcoaching.co.uk](mailto:info@theartofcoaching.co.uk). We will consider your request in accordance with applicable laws. To protect your privacy and security, we may take steps to verify your identity before complying with the request.

You also have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. A list of contact details for the EU data protection authorities is available [here](#).

## **LEGAL BASIS FOR PROCESSING (EEA ONLY)**

If you are an individual from the European Economic Area (EEA), our legal basis for collecting and using the personal information will depend on the personal information concerned and the specific context in which we collect it. However, we will normally collect personal information from you only where:

- (a) we have your consent to do so,
- (b) where we need the personal information to perform a contract with you (e.g. to deliver the Services you have requested), or
- (c) where the processing is in our or a third party's legitimate interests (and not overridden by your data protection interests or fundamental rights and freedoms). In some cases, we may also have a legal obligation to collect personal information from you, or may otherwise need the personal information to protect your vital interests or those of another person.

Where we rely on your consent to process the personal information, you have the right to withdraw or decline your consent at any time. Please note that this does not affect the lawfulness of the processing based on your consent before its withdrawal.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information). Similarly, if we collect and use your personal information in reliance on our (or a third party's) legitimate interests which are not already described in this notice, we will make clear to you at the relevant time what those legitimate interests are.

If you have any questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us at [info@theartofcoaching.co.uk](mailto:info@theartofcoaching.co.uk).

## **LINKS TO OTHER SITES**

Our website contains links to other sites that are not owned or controlled by us. Please be aware that we are not responsible for the privacy practices of such other sites.

We encourage you to be aware when you leave our website and to read the privacy policies of each and every website that collects personal information.

This Policy applies only to information collected by our website.

## **POLICY CHANGES**

We may update this Policy to reflect changes to our information practices. If we make any material changes we will notify you by email (sent to the email address specified in your account) or by means of a notice on this website prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

Any questions or concerns about this policy should be brought to our attention by sending an email to [info@theartofcoaching.co.uk](mailto:info@theartofcoaching.co.uk) and providing us with information relating to your concern.