DATA PRIVACY POLICY 2023



We understand that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits the ACD website and will only collect and use personal data in ways that are described here, and in a manner that is consistent with our obligations and your rights under the law.

Please read this privacy policy carefully and ensure that you understand it. Your acceptance of our privacy policy is deemed to occur upon first use of the site. If you do not accept and agree with this privacy policy, you must stop using the site immediately.

Who is holding your information Name Sally Anderson Company Anderson Coaching & Development Data retention period (s) Customer/supplier - 7 years from last financial transaction. Person responsible for data with our business Sally Anderson. Information Commissioner's Office Data regulator contact details Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF https://ico.org.uk/

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you. It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at sally@andersoncd.co.uk

1.WHAT DATA DO WE COLLECT ABOUT YOU

Personal data means any information capable of identifying an individual. It does not include anonymised data. We may process certain types of personal data about you as follows:

• **Identity Data** may include your first name, maiden name, last name, username, marital status, title, date of birth and gender.

• **Contact Data** may include your billing address, delivery address, email address and telephone numbers.

• Financial Data may include your bank account and payment card details.

• **Transaction Data** may include details about payments between us and other details of purchases made by you.

• **Marketing and Communications Data** may include your preferences in receiving marketing communications from us and our third parties and your communication preferences.

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, information about your health and genetic and biometric data. We do not collect any information about criminal convictions and offences.

2. HOW WE COLLECT YOUR PERSONAL DATA

We collect data about you through a variety of different methods including:

• Direct interactions: You may provide data by filling in forms on our site (or otherwise) or by communicating with us by post, phone, email or otherwise, including when you:

- order our products or services;
- create an account on our site;
- subscribe to our service or publications;
- request resources or marketing be sent to you;
- enter a competition, prize draw, promotion or survey; or
- give us feedback.

3. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when legally permitted. The most common uses of your personal data are:

• Where we need to perform the contract between us.

• Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

• Where we need to comply with a legal or regulatory obligation. Generally, we do not rely on consent as a legal ground for processing your personal data, other than in relation to sending marketing communications to you via email or text message.

You have the right to withdraw consent to marketing at any time by emailing us at <u>sally@andersoncd.co.uk</u>

4. MARKETING COMMUNICATIONS

You will receive marketing communications from us if you have:

- (i) requested information from us or purchased goods or services from us; or
- (ii) if you provided us with your details when you entered a competition or registered for a promotion or free resources; and
- (iii) In each case, you have not opted out of receiving that marketing. We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by emailing us at <u>sally@andersoncd.co.uk</u> at any time.

Where you opt out of receiving our marketing communications, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

5. CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to find out more about how the processing for the new purpose is compatible with the original purpose, please email us at sally@andersoncd.co.uk

If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing. We may process your personal data without your knowledge or consent where this is required or permitted by law.

6. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below:

- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances
- Social media outlets whom we use to deliver relevant content and advertisements to you.
- Cloud providers and email marketing platforms, such as DropBox and Mailchimp, in order to manage our relationship with you.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

7. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes. In some circumstances you can ask us to delete your data: see below for further information. In some circumstances, we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

8. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

• Request access to your personal data.

- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

You can see more about these rights at: https://ico.org.uk/for-organisations/guide-to-the generaldata-protection-regulation-gdpr/individual-rights/ If you wish to exercise any of the rights set out above, please email us at <u>sally@andersoncd.co.uk</u>

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

9. THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.