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## **Privacy Policy**

### **Privacy policy**

Your personal data will be treated with care, privacy and with respect. Personal information may be utilised to enable me the creation of self development, training and coaching programmes and products; to maintain accounts and records; to comply with regulations and insurer requirements; and for marketing and promotional posts and materials.

We will request and retain only the information that is needed. If your information should change, please let us know. You can email [zoe@phoenixlifecoach.co.uk](mailto:zoe@phoenixlifecoach.co.uk).

### **Who 'we' are**

This policy sets out details of how we collect and process personal data. I, (Zoe Thompson) am the data controller, the person responsible for your personal data (I am referred to as 'we', 'us', or 'our' in the remainder of this notice).

You can contact us about anything relating to this policy by sending an email

### **Some terminology**

"Personal data" is any information that identifies a particular (living) person.

"Special Category Data" refers to information that relates to a person's: racial or ethnic origin; political opinions; religious or similar beliefs; trade union membership; physical or mental health; sexual life or sexual orientation.

"Process" is the act of doing something with that information, including for example: collecting, storing, altering, adapting, or deleting it.

### **Who we process data about:**

We may process information about you if you fall into one of these categories:

- Enquirers (people who express an interest in our products or services)
- Clients (organisations and individuals who receive our products or services by directly contracting with us)

- Participants (individuals who receive our products or services as a result of their organisation or another entity contracting with us)
- Suppliers (who sell us goods and services)
- Associates (who support the delivery of our products or services, e.g. trainers and guest speakers)
- Subscribers (who elect to receive updates e.g. from our blog or website)
- Visitors to our website

### **Where we get your data**

Most of the data we process is provided by you, for one of the following reasons:

- You have enquired about our products or services
- You have contracted with us for our products or services
- You have participated in one of our programmes
- You have, or are considering contributing to our products or services
- You supply or have the potential to supply us with products or services
- You have subscribed to receive website updates, joined a members area of the site, or similar
- You have visited our website
- You have made a complaint to us
- You have made an information request to us

We may receive personal information indirectly, in the following scenarios:

- We have received your information from your organisation (our Client), because you will be acting on their behalf
- We have received your information from your organisation (our Client), because you will be, or have been a recipient of our products or services
- We have indirectly collected your information from analytics providers, or from your use of our website

We may generate data that relates to you, based on your interactions with us and data you have already provided, for example when:

- We process financial transactions and create a record of your financial history with us
- We process records of your engagement with our products or services

What personal data we may collect

We may process the following information about you:

- Your name and contact details (e.g. email address, address, telephone number)
- Your business name and business contact details (e.g. job title, email address, address, telephone number)
- Your financial details (e.g. invoices, payments)
- Details of products or services you have received or enquired about
- Your communication preferences
- Your dietary and accessibility requirements and preferences (e.g. if you are attending our events)
- Technical data (e.g. your IP address, login data, your use of our website)
- Any other information you provide to us – through our website, over the phone, by email, or otherwise (e.g. if you make an enquiry)

### **How we may use your data**

We may process your data in order to:

- Respond to enquiries you make about our products or services

- Create and carry out a contract with you to deliver our products or services
- Respond to communications, enquiries or complaints relating to contracts
- Process financial transactions that enable you to purchase our products or services
- Keep records of products and services you order, and communications that relate to those orders
- Inform you of similar products or services to those you have already enquired about or received from us
- Comply with any legal obligations we are subject to or as required by a government authority
- Obtain or maintain insurance policies
- Obtain professional advice
- Administer, protect, and improve our products, services, business and website
- Monitor and analyse the use of our website

**If you do not provide personal data**

Where we need to collect your personal data by law, or under the terms of a contract we have (or are trying to create) with you, and you do not provide that data when requested, we may not be able to create or perform the contract (e.g. to provide you with our products or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

**Who we share your data with**

We don't sell, provide, share, or exchange your personal data to anyone else who may want to sell to you, use your data for research, or for other purposes.

We may sometimes outsource business functions to other people, who need access to some of your data so they can meet their legal and contractual requirements. For example:

- People providing our accountancy service have access to our customer and supplier information that is part of the invoicing / payments system.
- People providing catering services for our open events may have access to your name and dietary preferences, so they can provide appropriate refreshments.
- People providing venue services for our open events may have access to your name and accessibility requirements, so they can provide appropriate accessibility.

We may also be required, on occasion, to share your data with third party legal and regulatory bodies, e.g. HM Revenue & Customs, regulators and other authorities. In all instances, we share only the data that is appropriate and necessary for the purpose.

**How long we retain your data**

For Clients, Suppliers and Associates, we will keep your data for as long as is necessary to satisfy our obligations to HMRC and our insurers.

For Enquirers, we keep your information for long enough to make make our sales and delivery effective.

For Participants who have not migrated to another category (e.g. by contacting us directly [Enquirer] or joining one of our forums as a result of participating in our products or services [Participant /

Client]), we delete your data after we have returned it to the organising Client, at the end of our contract with them.

For Subscribers, we keep your information for as long as you choose to remain subscribed.

Data retention periods are currently:

- For Clients, Suppliers and Associates: 7 years post-assessment by HMRC.
- For Enquirers: 3 years after most recent activity or communication.
- For Subscribers: For users that register on our website (if any), we also store the personal information you provide in your user profile. All users can see, edit, or delete their personal information at any time (except you cannot change your username). Website administrators can also see and edit that information.
- For Visitors to our website: If you leave a comment, the comment and its metadata are retained indefinitely. This is so we can recognise and approve any follow-up comments automatically instead of holding them in a moderation queue.

### **Where we send your data**

We use mainstream software and packages to administer our business, for functions such as accounting; customer relationship management; email; and digital address books. As a result, your data is held either in the European Economic Area (EEA), or other country with adequate level of data protection (e.g. in the USA with EU-US Privacy Shield).

### **What rights you have over your data**

You have the right to request a copy of the data we hold about you; and the right to have inaccurate or out-of-date data corrected. In some circumstances you also have the right to request your data be erased. This does not include any data that we are obliged to keep for regulatory, statutory, accounting, taxation or insurance purposes.

### **How we protect your data**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We also limit access to your personal data to those agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach in accordance with the legal requirements to do so.

### **Complaints**

If you have a complaint about the way we collect or process your personal data, or about the way we have responded to a request for information, correction, or erasure, please email us at [zoe@phoenixlifecoach.co.uk](mailto:zoe@phoenixlifecoach.co.uk) in the first instance.

If we are unable to resolve the issue, you have the right to lodge a complaint with the Information Commissioners Office by telephoning 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England, UK.