



## PRIVACY POLICY

### 1. INTRODUCTION

This privacy notice provides you with an explanation of how we collect and process your personal data through your use of our website, including any data you may provide when you register with us, sign up to our newsletter and/or purchase a product or service

This website is not intended for children, and we do not knowingly collect data relating to children. Alison Langridge is the data controller, and we are responsible for processing of your personal data.

#### Contact details

Our full details are:

Alison Langridge

Email address: [alison@thewordflowcoach.co.uk](mailto:alison@thewordflowcoach.co.uk)

It is important that the information we hold about you is accurate and up to date. Please let us know at any time if your personal information changes, by emailing us at [alison@thewordflowcoach.co.uk](mailto:alison@thewordflowcoach.co.uk).

The WordFlow Coach is registered with the Information Commissioner's Office (ICO). The ICO is the UK's independent body responsible for upholding information rights. It promotes openness by public bodies and ensures compliance with data protection laws. The register can be viewed and downloaded [here](#).

### 2. GDPR

For users in the European Union, we adhere to the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, known as the General Data Protection Regulation (the "GDPR"). For users in the United Kingdom, we adhere to the GDPR as enshrined in the Data Protection Act 2018. We have not appointed a Data Protection Officer as we do not fall within the categories of controllers and processors required to appoint a Data Protection Officer under Article 37 of the GDPR.

### 3. LEGAL GROUNDS FOR COLLECTING AND PROCESSING PERSONAL DATA

Personal data means any information capable of identifying a living individual. It does not include anonymised data.

We may process the following categories of personal data about you:

**Communication Data** that includes any communication that you send to us whether that be through the contact form on our website, through email, text, social media messaging, social media posting or any other communication that you send us. We process this data for the purposes of communicating with you, for record keeping or for legal claims.

**Customer Data** that includes data relating to any purchases of services such as your name, title, billing address, delivery address email address, phone number, contact details, purchase details and your card details. We process this data to supply the goods and/or services you have purchased and to keep records of such transactions. This is to allow processing of a legal contract between you and us and/or taking steps at your request to enter into such a contract.

**User Data** that includes data about how you use our website, open emails and any online services together with any data that you post for publication on our website or through other online services. We process this data to operate our website and ensure relevant content is provided to you and to ensure the security of our website.

**Marketing Data** that includes data about your preferences in receiving marketing from us and our third parties and your communication preferences. We process this data to enable you to partake in our promotions such as competitions, to deliver relevant website content and email promotions and advertisements to you and measure or understand the effectiveness of this advertising.

**Technical Data** that includes data about your use of our website and online services such as your IP address, location, page views and time zone settings. The source of this data is from our analytics tracking system. We process this data to analyse your use of our and to deliver relevant website content.

We may use Customer Data, User Data, Technical Data and Marketing Data to deliver relevant website content and advertisements to you (including Facebook adverts or other display advertisements) and to measure or understand the effectiveness of the advertising we serve 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, information about your health and genetic and biometric data. We do not collect any information about criminal convictions and offences.

#### **4. HOW WE COLLECT YOUR PERSONAL DATA**

We may collect data about you by you providing the data directly to us (for example by filling in forms on our site or by sending us emails). We may automatically collect certain data from you as you use our website by using cookies and similar technologies. Please see our cookie policy for more details about this.

#### **4. MARKETING COMMUNICATIONS**

Under the Privacy and Electronic Communications Regulations, we may send you marketing communications if (i) you made a purchase or asked for information from us about our services or (ii) you agreed to receive marketing communications and in each case you have not opted out of receiving such communications since. Under these regulations, if you are a limited company, we may send you marketing emails without your consent. However, you can still opt out of receiving marketing emails from us at any time.

#### **5. SHARING OF PERSONAL DATA**

We will not share or sell your personal data to any third party except in the following cases:

- i. If the law has been broken or we suspect it to have been broken
- ii. If it is required for legal proceedings
- iii. To prove or protect our legal rights and
- iv. To buyers or prospective buyers of in the event that we seek to sell our business

Please note: We are not responsible for protecting your personal data in the event that you follow hyperlinks from our site to another site as we have no control over their privacy policies and practice. We encourage you to read the privacy policy of each website that you visit.

We do not transfer your personal data outside the UK. We may transfer your personal data to service providers that carry out certain functions on our behalf. This may involve transferring personal data outside the UK to countries which have laws that do not provide the same level of data protection as the UK law. Whenever we transfer your personal data out of the UK to service

providers, we ensure a similar degree of protection is afforded to it by ensuring that the following safeguards are in place:

- We will only transfer your personal data to countries that have been deemed by the UK to provide an adequate level of protection for personal data; or
- We may use specific standard contractual terms approved for use in the UK which give the transferred personal data the same protection as it has in the UK.

## **6. DATA SECURITY**

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. In addition, we limit access to your personal data to those 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 where we are legally required to do so.

## **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.

For tax purposes the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers.

In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **8. YOUR LEGAL RIGHTS**

Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

You can find out more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email us at [alison@thewordflowcoach.co.uk](mailto:alison@thewordflowcoach.co.uk).

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.

## **9. COOKIES**

A cookie is a small file, stored on a user's hard drive by a website. Its purpose is to collect data relating to the users' browsing habits. You can choose to be notified each time a cookie is transmitted. You can also choose to disable cookies entirely in your internet browser, but this may decrease the quality of your user experience.

We use Functional Cookies on our site. Functional cookies are used to remember the selections you make on our site so that your selections are saved for your next visit.

## **10. COMPLAINTS**

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](http://www.ico.org.uk)). However, we would encourage you to contact us in the first instance so that we can try to resolve the complaint for you.