Dr Kim Wilson Coaching Limited- Privacy Policy & Cookies Policy

Privacy Policy

This privacy policy explains how we collect, use, disclose, transfer, and store any personal information that we collect from you or that you provide to us.

It also provides information about your rights and about how you can contact us if you have questions about how we handle your information.

We are Dr Kim Wilson Coaching Ltd ("Dr Kim", "we" "us" and "our"). We are the data controller under the Data Protection Act 2018.

We keep our privacy policy under regular review. This version was last updated on: Dec 2023

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1. User privacy and data protection statement

We are committed to safeguarding the privacy of our clients, website visitors and individuals within our value chain. We will never sell, rent or otherwise accept payment from third parties to distribute or make public your personal information.

2. Who this policy applies to

This policy applies to individuals who access, use, and/or interact with our services, websites, applications and platforms, and third-party platforms that host our websites and/or content, as well as supplying goods and services to us.

In particular, this policy applies to:

- Individuals registered as clients with Dr Kim
- users of our company website drkimwilson.com
- to employees and other personnel of our partners and suppliers

It is important you read this privacy policy to understand how and why we process your personal information.

Our website is not intended for children and we do not knowingly collect data relating to children.

3. What personal information we collect

Personal data, or personal information, means any information about you from which you can be identified. It does not include data where the identity has been removed (anonymous data). The types and categories of personal information we collect depends on how you are interacting with us,

or which services you are purchasing or using. We may collect a range of personal data, which includes:

- **Name and contact data**, such as first and last name, email address, postal address, country of residence, phone number, and other similar contact information
- **Professional and business data,** such as the name of your current employer or business, professional qualifications or memberships, business contact information, sector or industry
- **Payment information**, such as debit or credit card information, bank details or other associated payment method, if you make a payment.
- **Location data**, for identifying the location of clients for the purpose of services provided by Dr Kim.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.

Sensitive Data (known as Special Categories of Personal Data) includes details about 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 collect Sensitive Data of clients, when performing coaching services, for example in relation to physical or mental health conditions. We rely on your consent to do this.

4. What non-personal information we use and collect

The website also collects and uses information that is not directly associated with any specific individual. This is anonymous, non-personal information collected may include geographical location, device, internet browser, operating system, and IP address through third party processors, such as Google Analytics.

We may use non-personal information for any purpose to understand the use of our website and services, and to improve and enhance user experience and inform future products.

We may also discuss client cases on an anonymous basis in order to review and improve our services and provide support to our coaching personnel and/or other sector professionals.

5. How is your personal information collected

We collect personal information from a number of different methods and sources, the main ones being:

- **During coaching services.** If you are one of our clients, we will need to collect and process your personal data to provide our services to you.
- **Direct interactions.** You may give us your personal information by filling in forms or by corresponding with us by post, phone, website, email, social media or otherwise. This includes personal data you provide when you
 - When you are a client;
 - When you attend one of our workshops;
 - Click on a landing page or otherwise enquire about our services or workshops;
 - subscribe to our newsletter or mailing list;
 - request marketing to be sent to you;
 - respond to a survey or provide feedback.

- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below.
- analytics providers such as Google;
- certifying bodies and regulators;
- business websites and professional social media;
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services;
- If you work for one of our suppliers or corporate partners.

Cookies. As you interact with our website, we will automatically collect technical data about your equipment, browsing actions and patterns. We do this to identify you from other users and enhance your user experience of our services. We collect this personal data by using cookies, server logs and other similar technologies. Please see our at the end of this Privacy Policy, for further details.

6. How we use your personal data and lawful basis doing so

We may only use your personal information for specific, permitted purposes when we have a lawful basis to do so. Most commonly, we will use your personal information in the following circumstances:

- Where you have given us your consent, including:
 - \circ $\;$ Sensitive Data obtained when providing coaching services.
 - $\circ~$ Share marketing with you, including information on upcoming workshops and advertising, with your consent.
 - Communicate tailored information such as news, research, reports, if you have signed up to our newsletter or email communications.
- Where we need to perform the contract with you, including
 - \circ $\;$ Set up clients and administer use of our services.
 - Set up, take payment and manage invoicing.
 - Authenticate and verify your identity.
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests, including:
 - Operate the website and provide our services
 - Respond to enquiries
 - \circ Communicate important information about our services, your subscription or account.
 - \circ $\,$ Conduct surveys or research to understand the use of, and deliver, develop, and improve our services
 - $\circ~$ To obtain goods and services from our suppliers, to enter collaborations or service delivery with corporate partners.
- Where we need to comply with a legal obligation, including
 - to comply with safeguarding, anti money laundering, terrorism reporting or other legal requirements applicable to the coaching services.
 - o Meet external and internal audit requirements
 - Tax reporting and accounts
- 7. Third Parties and permitted disclosures

We may share your personal information with carefully selected third parties. Third parties include, but are not limited to:

Third party service providers/suppliers, including IT support, communications and payment providers:

- Google Workspace forms
- Stripe or Revolut (who may also use third parties such as Apple Pay, Paypal, Go Cardless)
- Adobe Acrobat Sign or Docusign

We ensure appropriate checks and contractual controls are in place with all third parties processing personal information on the Dr Kim's behalf.

Other third parties, including:

- Professional advisers including lawyers, bankers, marketing agencies, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- Credit reference agencies, law enforcement and fraud prevention agencies.
- HM Revenue & Customs, regulators and other authorities who require reporting or processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

Third party links. Our website(s) 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 policy of every website you visit.

8. Marketing

We market to individuals who may be interested in becoming a client of Dr Kim, but will only do this with your consent.

We do contact and market to organisations which we believe may be interested in our services for their personnel, or becoming a corporate partner or customer. As such, we may contact you using your business contact information in order to discuss this with you or your employer. We rely on our legitimate business interests to do this.

We strive to provide you with choices regarding any marketing communication and you will be able to opt out of any communications. We operate a suppression list to ensure we can manage this process, which means we keep the minimal personal data necessary to ensure we do not contact you again.

9. Where we store your personal data and retention

Your information is securely stored in a Google data centre in the UK. Your personal data will be stored within our password protected database and secure internal computers. Your data will be stored for the length of time deemed to be appropriate, based on the type and sensitivity of the data, and by reference to the purpose it was collected for.

We take precautions, to protect your personal data against loss, theft, misuse, unauthorised access, disclosure, alteration, and destruction. We will do our best to protect your personal information, however, we cannot guarantee the security of your data transmitted to our website or via email, by virtue of the unsecure nature of the internet. Any transmission is at your own risk.

10. International transfers

We do not usually transfer your personal data to third parties outside the UK (or the EEA for as long as it has an adequacy decision from the UK Government).

11. Your rights

Under data protection law, you have rights included:

- *Right of Access* You have the right to ask us for copies of your personal information.
- *Right To Rectification* You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- *Right to Erasure* You have the right to ask us to erase your personal information in certain circumstances.
- *Right to Restriction of Processing* You have the right to ask us to restrict the processing of your information in certain circumstances.
- *Right to Object to Processing* You have the right to object to the processing of your personal data in certain circumstances.
- *Right to Data Portability* You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.
- *Withdrawal of consent* you may withdraw your consent at any time, but this won't affect the validity of processing already carried out with your consent.

Please note. These rights are not absolute and are balanced against other people's and Dr Kim's rights and other legal requirements.

If you make a request, we have one month to respond to you. You are not required to pay any charge for exercising your rights.

To make a request, please contact the Dr Kim directly. See section 14.

12. Updating your personal data

Please notify us of any changes to the personal data which you have provided to us, so that we may keep your records up to date.

13. How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at Dr Kim Wilson Coaching Limited. See section 14 for contact details.

You can also complain to the Information Commissioner's Office (ICO) if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline number: 0303 123 1113 ICO website: <u>https://www.ico.org.uk</u>

14. Contact Dr Kim Coaching Limited

Email address: support@drkimwilson.com

Dr Kim Website: drkimwilson.com

Cookies Policy

Like most websites, drkimwilson.com the "Website") uses cookies to provide you with the best user experience and to improve the performance of our services.

This policy provides you with information regarding what cookies we may set, and how to accept or reject those cookies.

Date updated: 15/12/23

1. What are cookies?

Cookies are simple text files that are stored on your computer or device by a website's server. Each cookie is unique to your web browser. It will contain anonymous information such as a combination of numbers and digits, a unique identifier and website domain name.

Cookies have a number of functions, including remembering your preferences, supporting users to log in to a website, analyse traffic to a website or track user browsing behaviour.

2. What types of cookies do we use?

- Strictly necessary cookies, allow us to offer you the best possible experience when accessing and navigating through our Website and using its features, products or services. These cookies enable core functionality such as security and verification and cannot be disabled. For example, these cookies let us recognise that you have created an account and logged into that account to access our products or services.
- **Marketing cookies** are used to track how effective advertising has been to provide users with a relevant service and to deliver future advertisements best suited to your interests.
- **Functionality cookies,** let us operate the site in accordance with the choices you make to create the most personalised experience. For example, we will recognise your username and remember how you customised the site during future visits.
- **Analytical cookies,** enable us and third-party services to collect aggregated data for statistical purposes on how our visitors use the Website. These cookies do not contain personal information such as names or email addresses and are used to help us improve your user experience of the Website and understand how users interact with our products and services.

Apart from strictly necessary cookies, We do not use cookies to collect or share any personally identifiable information without your permission, including the collection of any sensitive information, sharing data to advertising networks or sharing personally identifiable information to third parties.

3. What are 'session' and 'persistent' cookies?

Cookies that expire at the end of a browser session (normally when a user exits their browser) are called 'session cookies'. These cookies can be used for security purposes, such as when a user logs into an account and will expire when the session ends.

Persistent cookies are stored on a user's device in-between sessions and can allow user preferences or actions to be remembered across a site (or across different websites). Persistent cookies can remember user preferences and choices when using a site or be used to target advertising.

4. What are 'first-party' and 'third-party' cookies?

Whether a cookie is 'first-party' or 'third-party' refers to the website or domain placing the cookie.

First-party cookies are set by the website the user is visiting, e.g drkimwilson.com

Third-party cookies are set by a domain other than the one the user is visiting. This usually occurs when the website incorporates elements from other sites, such as images, social media plug-ins or advertising. When the browser or other software fetches these elements from the other sites, they can set cookies also.

This Website uses both 'first-party' and 'third-party' cookies. For information regarding our third parties, please see our Privacy Policy.

5. How to manage your cookie preferences

Except for strictly necessary cookies which are essential for the functionality of the Website, you can choose to accept or decline cookies. You can provide your consent to the use of non-necessary cookies by opting in when you first visit the site, and further manage or withdraw your permissions via our third party cookies manager. Further details on the current cookies we use are available within the cookies manager on our website(s).

You can also use your web browser to manage cookies, including to:

- Delete all cookies
- Block all cookies
- Allow all cookies
- Block 'third-party' cookies (cookies set by domains other than the one you are visiting)
- Clear all cookies when you close the browser

Further information regarding how to manage cookies using your web browser can be found at the following links:

<u>Microsoft Edge</u> <u>Google Chrome</u> <u>Apple Safari</u> <u>Firefox</u>

Please note:

• Many of the interactive functions offered by the Website are dependent on cookies. Disabling or blocking cookies on your browser may impact the functionality of the Website, or result in an inferior user experience.