

Protecting Your Privacy



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1. Introduction

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data, and keep it safe.

We know that there's a lot of information here, but we want you to be fully informed about your rights, and how Newlands Personal Development & Avril Gill uses your data.

We hope the following sections will answer any questions you have but if not, please do get in touch with us.

It's likely that we'll need to update this Privacy Notice from time to time. We'll notify you of any significant changes, but you're welcome to come back and check it whenever you wish.

For simplicity throughout this notice, 'we' and 'us' means Newlands Personal Development & Avril Gill.

2. Explaining the legal bases we rely on

The law on data protection sets out a number of different reasons for which a company may collect and process your personal data, including:

Consent

In specific situations, we can collect and process your data with your consent.

For example, when you tick a box to receive email newsletters.

When collecting your personal data, we'll always make clear to you which data is necessary in connection with a particular service.

Contractual obligations

In certain circumstances, we need your personal data to comply with our contractual obligations.

For example, if you are a client or purchase an online course, book or audio download, we'll collect your address details for our records only or to deliver your purchase, and pass them to the relevant courier.

Legal compliance

If the law requires us to, we may need to collect and process your data.

For example, we can pass on details of people involved in fraud or other criminal activity affecting Newlands Personal Development & Avril Gill to law enforcement .

Legitimate interest

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests.

For example, we will use your purchase history to send you or make available personalised offers.

We will also use your address details to send you direct marketing information by post, telling you about products and services that we think might interest you.

4. When do we collect your personal data?

When you visit any of our websites, and use your account to buy products and services, or sign up for newsletters and information.

When you make an online purchase and check out as a guest (in which case we just collect transaction-based data).

When you create an account with us.

When you book an appointment online via our online booking system or through a third party booking system such as Eventbrite.

When you engage with us on social media.

When you download or install one of our apps.

When you contact us by any means with queries, complaints etc.

When you ask us to email you information about a product or service.

When you enter prize draws or competitions.

When you choose to complete any surveys we send you.

When you comment on or review our products and services.

Any individual may access personal data related to them, including opinions.

When you fill in any forms. For example, if you sign up for a free product or service, we may collect your personal data.

5. What sort of personal data do we collect?

If you have a web account with us: your name, billing/delivery address, orders and receipts, email and telephone number. For your security, we'll also keep an encrypted record of your login password.

For example, we collect notes from our conversations with you, details of any complaints or comments you make, details of purchases you made.

Details of your visits to our websites or apps, and which site you came from to ours.

Information gathered by the use of cookies in your web browser.

We'll only ask for and use your personal data collected for recommending self help tools that may be of interest to you. Of course, it's always your choice whether you share such details with us.

Payment card information via third party payment systems (Stripe)

Your comments and reviews.

Your social media username, if you interact with us through those channels, to help us respond to your comments, questions or feedback.

Digital photographs taken on workshops, retreats or other seminars, which are used for marketing purposes (with your consent both verbally and inferred based on previous prior consent).

6. How and why do we use your personal data?

We want to give you the best possible customer experience. One way to achieve that is to get the richest picture we can of who you are by combining the data we have about you.

We then use this to offer you promotions, products and services that are most likely to interest you.

The data privacy law allows this as part of our legitimate interest in understanding our customers and providing the highest levels of service.

Of course, if you wish to change how we use your data, you'll find details in the 'What are my rights?' section below.

Remember, if you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to provide some services you've asked for.

For example, if you've asked us to let you know when we are running a course or workshop or have new audio downloads available or free courses we can't do that if you've withdrawn your general consent to hear from us.

Here's how we'll use your personal data and why:

To process any orders that you make by using our websites, apps or in person. If we don't collect your personal data during checkout, we won't be able to process your order and comply with our legal obligations.

For example, your details may need to be passed to a third party to supply or deliver the product or service that you ordered, and we may keep your details for a reasonable period afterwards in order to fulfil any contractual obligations such as refunds, guarantees and on going memberships to our sites.

To respond to your queries, refund requests and complaints. Handling the information you sent enables us to respond. We may also keep a record of these to inform any future communication with us and to demonstrate how we communicated with you throughout. We do this on the basis of our contractual obligations to you, our legal obligations and our legitimate interests in providing you with the best service and understanding how we can improve our service based on your experience.

To protect our business and your account from fraud and other illegal activities. This includes using your personal data to maintain, update and safeguard your account. We'll do all of this as part of our legitimate interest.

For example, by checking your password when you login and using automated monitoring of IP addresses to identify possible fraudulent log-ins from unexpected locations.

To process payments and to prevent fraudulent transactions. We do this on the basis of our legitimate business interests. This also helps to protect our customers from fraud.

With your consent, we will use your personal data, preferences and details of your transactions to keep you informed by email, web, text, telephone about relevant products and services including tailored special offers, discounts, promotions, events, competitions and so on.

Of course, you are free to opt out of hearing from us by any of these channels at any time.

To send you relevant, personalised communications by post in relation to updates, offers, services and products. We'll do this on the basis of our legitimate business interest.

You are free to opt out of hearing from us by post at any time.

To send you communications required by law or which are necessary to inform you about our changes to the services we provide you. For example, updates to this Privacy Notice, and legally required information relating to your orders. These service messages will not include any promotional content and do not require prior consent when sent by email or text message. If we do not use your personal data for these purposes, we would be unable to comply with our legal obligations.

To administer any of our prize draws or competitions which you enter, based on your consent given at the time of entering.

To develop, test and improve the systems, services and products we provide to you. We'll do this on the basis of our legitimate business interests.

To comply with our contractual or legal obligations to share data with law enforcement.

For example, when a court order is submitted to share data with law enforcement agencies or a court of law

To send you survey and feedback requests to help improve our services. These messages will not include any promotional content and do not require prior consent when sent by email or text message. We have a legitimate interest to do so as this helps make our products or services more relevant to you.

Of course, you are free to opt out of receiving these requests from us at any time by updating your preferences in your online account.

To build a rich picture of who you are and what you like, and to inform our business decisions, we'll combine data captured from across Newlands Personal Development & Avril Gill. We'll do this on the basis of our legitimate business interest.

For example, by combining this data, this will help us personalise your experience and decide which inspiration or content to share with you.

To process your booking/appointment requests (for example with a Personal Coach or Hypnotherapist).

7. Combining your data for personalised direct marketing

We want to bring you offers and promotions that are most relevant to your interests at particular times. To help us form a better, overall understanding of you as a customer, we combine your personal data gathered across Newlands Personal Development. & Avril Gill as described above, for example your customer history at both Avril Gill and Newlands Personal Development.

8. How we protect your personal data

We know how much data security matters to all our customers. With this in mind we will treat your data with the utmost care and take all appropriate steps to protect it.

We secure access to all transactional areas of our websites and apps using 'https' technology.

Access to your personal data is password-protected, and sensitive data such as payment card information) is secured and tokenised to ensure it is protected.

We regularly monitor our system for possible vulnerabilities and attacks, and we carry out regular systems security to ensure your data is kept safe and secure.

9. How long will we keep your personal data?

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected.

As per our contractual agreement with our Insurance provider Balens, for all Hypnotherapy & Coaching clients information will be held for 7 years.

At the end of that retention period, your data will either be deleted completely

Some examples of customer data retention periods:

Membership sites and lifelong e-learning platforms 10 years.

10. Who do we share your personal data with?

We sometimes share your personal data with trusted third parties.

Here's the policy we apply to those organisations to keep your data safe and protect your privacy:

We provide only the information they need to perform their specific services.

They may only use your data for the exact purposes we specify in our contract with them.

We work closely with them to ensure that your privacy is respected and protected at all times.

If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

Examples of the kind of third parties we work with are:

IT companies who support our website and other business systems.

Operational companies such as delivery couriers.

Google/Facebook to show you products that might interest you while you're browsing the internet. This is based on either your marketing consent or your acceptance of cookies on our websites. See our Cookies Notice for details.

Sharing your data with third parties for their own purposes:

We will only do this in very specific circumstances, for example:

With your consent, given at the time you supply your personal data, we may pass that data to a third party for their direct marketing purposes.

Or if we run a joint event with another provider, and you agree to receive direct communications from them.

For fraud management, we may share information about fraudulent or potentially fraudulent activity on our systems. This may include sharing data about individuals with law enforcement bodies.

We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration.

For further information please contact our Data Protection Officer – Avril Gill

To help personalise your journey through our websites we currently use the following companies, who will process your personal data as part of their contracts with us:

- Facebook
- Twitter
- Instagram
- LinkedIn
- Quora
- New Kajabi
- Teachable
- Mailchimp
- Acuity
- Calendy
- Eventbrite
- Meetup

11. Where your personal data may be processed

Sometimes we will need to share your personal data with third parties and suppliers outside the European Economic Area (EEA), such as Australia or the USA.

Protecting your data outside the EEA

The EEA includes all EU Member countries as well as Iceland, Liechtenstein and Norway. We may transfer personal data that we collect from you to third-party data processors in countries that are outside the EEA.

For example, this might be required in order to fulfil your order, process your payment details or provide support services.

If we do this, we have procedures in place to ensure your data receives the same protection as if it were being processed inside the EEA. For example, our contracts with third parties stipulate the standards they must follow at all times. If you wish for more information about these contracts please contact our Data Protection Officer.

Any transfer of your personal data will follow applicable laws and we will treat the information under the guiding principles of this Privacy Notice.

12. What are your rights over your personal data?

An overview of your different rights

You have the right to request:

Access to the personal data we hold about you, free of charge in most cases.

The correction of your personal data when incorrect, out of date or incomplete.

For example, when you withdraw consent, or object and we have no legitimate overriding interest, or once the purpose for which we hold the data has come to an end.

That we stop using your personal data for direct marketing (either through specific channels, or all channels).

That we stop any consent-based processing of your personal data after you withdraw that consent.

You have the right to request a copy of any information about you that the Newlands Personal Development & Avril Gill holds at any time, and also to have that information corrected if it is inaccurate. To ask for your information, please contact Data Protection Officer, Newlands Personal Development, 8 Newlands Park, Dunfermline, KY12 0RG or email (Subject: access request) avrilgill@newlandspersonaldevelopment.com To ask for your information to be amended, please update your online account.

If we choose not to action your request we will explain to you the reasons for our refusal.

Your right to withdraw consent

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

Where we rely on our legitimate interest

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We

must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

Direct marketing

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

Checking your identity

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

13. How can you stop the use of your personal data for direct marketing?

There are several ways you can stop direct marketing communications from us:

Click the 'unsubscribe' link in any email communication that we send you. We will then stop any further emails from that particular division.

If you have an account, log in into your Newlands Personal Development or Avril Gill site, visit the 'My Account' area and change your preferences.

In our apps, you can manage your preferences and opt out from one or all of the different push notifications by selecting or deselecting the relevant options in the 'Settings' section.

Write to Avril Gill, Newlands Personal Development, 8 Newlands Park, Dunfermline, Fife, KY12 0RG

Please note that you may continue to receive communications for a short period after changing your preferences while our systems are fully updated.

14. Any questions?

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it.

If you have any questions that haven't been covered, please contact our Data Protection Officer who will be pleased to help you:

- avrilgill@newlandspersonaldevelopment.com
- Or write to us at Data Protection Officer, Newlands Personal Development, 8 Newlands Park, Dunfermline, Fife, KY12 0RG

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