Privacy Policy



This is the privacy policy of The Affinity Coach Ltd, company number 13014952. ('we', 'our', or 'us').

Our registered office is at 1 Price Close, Purton, Wiltshire, SN5 4JZ.

Introduction

This policy describes how we collect, store, transfer and use personal data. It tells you about your privacy rights and how the law protects you.

In the context of the law and this policy, 'personal data' is information that clearly identifies you as an individual or which could be used to identify you if combined with other information. Acting in any way on personal data is referred to as 'processing'.

This policy applies to personal data collected through our website and through social media platforms e.g. LinkedIn.

Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

Data Protection Officer

If you have any questions about how we process your personal data, including any requests to exercise your legal rights, please contact Wendy Buckingham, at wendy@theaffinitycoach.co.uk

Personal data we process

1. How we obtain personal data

The information we process about you includes information:

- you have directly provided to us

- that we gather from third party databases and service providers
- as a result of monitoring how you use our website or our services

2. Types of personal data we collect directly

When you use our website or our services, for example when you subscribe to our newsletter, we ask you to provide personal data. This can be categorised into the following groups:

- personal identifiers, such as your first and last names, your title and your date of birth
- contact information, such as your email address, your telephone number and your postal addresses for billing, delivery and communication
- account information, including your username and password
- payment information, such as a debit or credit card number and expiry date and bank account details
- records of communication between us including messages sent through our website, email messages and telephone conversations
- marketing preferences that tell us what types of marketing you would like to receive

3. Types of personal data we collect from third parties

We confirm some of the information you provide to us directly using data from other sources. We also add to the information we hold about you, sometimes to remove the need for you to provide it to us and sometimes in order to be able to assess the quality of the services you offer.

The additional information we collect can be categorised as follows:

- information that confirms your identity

- business information, including your business trading name and address, your company number (if incorporated), and your VAT number (if registered)
- information that confirms your contact information
- reviews and feedback about your business on other websites through which you sell your services
- unsolicited complaints by other users

4. Types of personal data we collect from your use of our services

By using our website and our services, we process:

- your username and password and other information used to access our website and our services
- information you contribute to our community, including reviews
- your replies to polls and surveys
- technical information about the hardware and the software you use to access our website and use our services, including your Internet Protocol (IP) address, your browser type and version and your device's operating system
- usage information, including the frequency you use our services, the pages of our website that you visit, whether you receive messages from us and whether you reply to those messages
- transaction information that includes the details of the products services you have bought from us and payments made to us for those services
- your preferences to receive marketing from us; how you wish to communicate with us; and responses and actions in relation to your use of our services.

5. Our use of aggregated information

We may aggregate anonymous information such as statistical or demographic data for any purpose. Anonymous information is that which does not identify you as an individual. Aggregated information may be derived from your personal data but is not considered as such in law because it does not reveal your identity.

For example, we may aggregate usage information to assess whether a feature of our website is useful.

However, if we combine or connect aggregated information with your personal data so that it can identify you in any way, we treat the combined information as personal data, and it will be used in accordance with this privacy policy.

6. Special personal data

Special personal data is data 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.

It also includes information about criminal convictions and offences.

We do not collect any special personal data about you.

7. If you do not provide personal data we need

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform that contract.

In that case, we may have to stop providing a service to you. If so, we will notify you of this at the time.

The bases on which we process information about you

The law requires us to determine under which of six defined bases we process different categories of your personal data, and to notify you of the basis for each category.

If a basis on which we process your personal data is no longer relevant then we shall immediately stop processing your data.

If the basis changes then if required by law we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

8. Information we process because we have a contractual obligation with you

When you use our website or our services, or otherwise agree to our terms and conditions, a contract is formed between you and us.

In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal data.

We may use it in order to:

- verify your identity for security purposes when you use our services
- sell products to you
- provide you with our services
- provide you with suggestions and advice on products, services and how to obtain the most from using our website

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

9. Information we process with your consent

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business, including our products and services, you provide your consent to us to process information that may be personal data.

Wherever possible, we aim to obtain your explicit consent to process this information, for example, we ask you to agree to our use of non-essential cookies when you access our website.

If you have given us explicit permission to do so, we may from time to time pass your name and contact information to selected associates whom we consider may provide services or products you would find useful.

We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us by emailing wendy@theaffinitycoach.co.uk. However, if you do so, you may not be able to use our website or our services further.

We aim to obtain and keep your consent to process your information. However, while we take your consent into account in decisions about whether or not to process your personal data, the withdrawal of your consent does not necessarily prevent us from continuing to process it. The law may allow us to continue to process your personal data, provided that there is another basis on which we may do so. For example, we may have a legal obligation to do so.

10. Information we process for the purposes of legitimate interests

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do after having given careful consideration to:

- whether the same objective could be achieved through other means
- whether processing (or not processing) might cause you harm
- whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so

For example, we may process your data on this basis for the purposes of:

- improving our services
- record-keeping for the proper and necessary administration of our business
- responding to unsolicited communication from you to which we believe you would expect a response
- preventing fraudulent use of our services
- exercising our legal rights, including to detect and prevent fraud and to protect our intellectual property
- insuring against or obtaining professional advice that is required to manage business risk
- protecting your interests where we believe we have a duty to do so

11. Information we process because we have a legal obligation

Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

This may include your personal data.

12. Information we process to protect vital interests

In situations where processing personal information is necessary to protect someone's life, where consent is unable to be given and where other lawful bases are not appropriate, we may process personal information on the basis of vital interests.

For example, we may inform relevant organisations if we have a safeguarding concern about a vulnerable person.

How and when we process your personal data

13. Your personal data is not shared

We do not share or disclose to a third party, any information collected through our website.

14. Disputes between users

In the event of a dispute between you and another user, provided that you consent, we may share your basic personal data, business information and contact information with the other user.

At our discretion, we may share other information to enable the dispute to be resolved through litigation or alternative dispute resolution methods.

15. Service providers and business partners

We may share your personal data with businesses that provide services to us, or with business partners.

As examples:

- we may pass your payment information to our payment service provider to take payments from you
- we may use fraud prevention agencies and credit reference agencies to verify your identity and we may pass your information to those agencies if we strongly suspect fraud on our website
- we may pass your contact information to advertising agencies to use to promote our services to you

16. Referral partners

This is information given to us by you in your capacity as an affiliate of us or as a referral partner.

It allows us to recognise visitors that you have referred to us, and to credit to you commission due for such referrals. It also includes information that allows us to transfer commission to you.

The information is not used for any other purpose.

We undertake to preserve the confidentiality of the information and of the terms of our relationship.

We expect any affiliate or partner to agree to reciprocate this policy.

Use of information we collect through automated systems

17. Cookies

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit a website that uses them. They allow information gathered on one web page to be stored until it is needed for use at a later date.

They are commonly used to provide you with a personalised experience while you browse a website, for example, allowing your preferences to be remembered.

They can also provide core functionality such as security, network management, and accessibility; record how you interact with the website so that the owner can understand how to improve the experience of other visitors; and serve you advertisements that are relevant to your browsing history.

Some cookies may last for a defined period of time, such as one visit (known as a session), one day or until you close your browser. Others last indefinitely until you delete them.

Your web browser should allow you to delete any cookie you choose. It should also allow you to prevent or limit their use. Your web browser may support a plug-in or add-on that helps you manage which cookies you wish to allow to operate.

The law requires you to give explicit consent for use of any cookies that are not strictly necessary for the operation of a website.

When you first visit our website, we ask you whether you wish us to use cookies. If you choose not to accept them, we shall not use them for your visit except to record that you have not consented to their use for any other purpose.

We use cookies in the following ways:

- to track how you use our website
- to record whether you have seen specific messages we display on our website
- to keep you signed in to our website
- to record your answers to surveys and questionnaires on our site while you complete them
- to record the conversation thread during a live chat with our support team

18. Personal identifiers from your browsing activity

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.

Other matters

19. Your rights

The law requires us to tell you about your rights and our obligations to you in regard to the processing and control of your personal data.

We do this now, by requesting that you read the information provided at http://www.knowyourprivacyrights.org

20. Use of our services by children

We do not sell products or provide services for purchase by children, nor do we market to children.

21. Encryption of data sent between us

We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us.

Whenever information is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.

22. Delivery of services using third party communication software

With your consent, we may communicate using software provided by a third party such as Facebook (WhatsApp), Apple (Facetime), Microsoft (Skype) or Zoom Video Communications (Zoom).

Such methods of communication should secure your personal data using encryption and other technologies. The providers of such software should comply with all applicable privacy laws, rules, and regulations, including the GDPR.

If you have any concerns about using a particular software for communication, please tell us.

23. Data may be processed outside the UK

Our website is hosted in the UK.

We may also use outsourced services in countries outside the UK from time to time in other aspects of our business.

Accordingly data obtained within the UK or any other country could be processed outside the UK.

We use the following safeguards with respect to data transferred outside the UK:

- the data protection clauses in our contracts with data processors include transfer clauses written by or approved by a supervisory authority.

24. Control over your own information

It is important that the personal data we hold about you is accurate and up to date. Please inform us if your personal data changes.

At any time, you may contact us to request that we provide you with the personal data we hold about you.

When we receive any request to access, edit or delete personal data we first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

Please be aware that we are not obliged by law to provide you with all personal data we hold about you, and that if we do provide you with information, the law allows us to charge for such provision if doing so incurs costs for us. After receiving your request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

If you wish us to remove personally identifiable information from our website, you should contact us to make your request.

This may limit the service we can provide to you.

We remind you that we are not obliged by law to delete your personal data or to stop processing it simply because you do not consent to us

doing so. While having your consent is an important consideration as to whether to process it, if there is another legitimate basis on which we may process it, we may do so on that basis.

25. Communicating with us

When you contact us, whether by telephone, through our website or by email, we collect the data you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our business.

We may keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high quality service.

26. Complaining

If you are not happy with our privacy policy, or if you have any complaint, then you should tell us.

Complaints may be sent via email to wendy@theaffinitycoach.co.uk

When we receive a complaint, we record the information you have given to us on the basis of consent. We use that information to resolve your complaint.

If your complaint reasonably requires us to notify some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion whether we do give information, and if we do, what that information is.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.

If you are in any way dissatisfied about how we process your personal data, you have a right to lodge a complaint with the Information Commissioner's Office (ICO). This can be done at https://ico.org.uk/make-a-complaint/. We would, however, appreciate the opportunity to talk to you about your concern before you approach the ICO.

27. Retention period

Except as otherwise mentioned in this privacy policy, we keep your personal data only for as long as required by us:

- to provide you with the services you have requested
- to comply with other law, including for the period demanded by our tax authorities
- to support a claim or defence in court

28. Compliance with the law

Our privacy policy complies with the law in the United Kingdom, specifically with the Data Protection Act 2018 (the 'Act') accordingly incorporating the EU General Data Protection Regulation ('GDPR') and the Privacy and Electronic Communications Regulations ('PECR').

29. Review of this privacy policy

We shall update this privacy policy from time to time as necessary.