

Website privacy policy

This website is operated by Debra Oakaby. We take your privacy very seriously therefore we urge you to read this policy very carefully because it contains important information about:

- who we are,
- how and why we collect, store, use and share personal information,
- your rights in relation to your personal information, and
- how to contact us and supervisory authorities in the event that you have a complaint.

Who we are

Debra Oakaby ('we' or 'us') (trading as Think Clearly Coaching) collect, use and are responsible for certain personal information about you. When we do so we are regulated under the General Data Protection Regulations which apply across the European Union (including the United Kingdom) and we are responsible as 'controller' of that personal information for the purposes of those laws.

The personal information we collect and use

a) Personal information you provide to us

We collect the following personal information that you provide to us:

First name and last name
Email address
Phone number
Address, State, Province, ZIP/Postal code, City

Some examples of when we collect this information include:

When filling in our contact us form. When signing-up for information about our affiliate programme. When you request a free consultation. When you purchase a product/service.

b) Personal information you provide about third parties

If you give us information about another person, you confirm that the other person has appointed you to act on their behalf and agreed that you:

shall consent on their behalf to the processing of their personal data;
shall receive any data protection notices on their behalf; and
shall consent on their behalf to the transfer of their personal data abroad.

c) Monitoring and recording communications

We may monitor communications such as emails and telephone calls for the following purposes:

Quality assurance

d) Cookies and similar technologies

A cookie is a small text file which is placed onto your computer or electronic device when you access our website. Similar technologies include web beacons, action tags, local shared objects ('flash cookies') and single-pixel gifs. Such technologies can be used to track users' actions and activities, and to store information about them. We use these cookies and/or similar technologies on this website.

For example we may use cookies to monitor and/or collect the following information:

how many times a user visits the website, which pages a user visits.

This information helps us to build a profile of our users. Some of this information may be aggregated or statistical, which means that we will not be able to identify you individually.

In addition it should be noted that in some cases our cookies or similar technologies may be owned and controlled by third parties who will also collect personal information about you.

On the first occasion that you use our site we will ask whether you consent to our use of cookies. If you do not, cookies will not be used. Thereafter you can opt-out of using cookies at any time or you can set your browser not to accept cookies and the websites below tell you how to remove cookies from your browser. However, some of our website features may not function as a result.

For further information on our use of cookies, please see our Website cookie policy.

For further information on cookies generally visit www.aboutcookies.org or www.allaboutcookies.org.

How we use your personal information

We collect information about our users for the following purposes:

to identify you and manage any accounts you hold with us, process your order, carry out customer profiling.

Who your information may be shared with

We may share your information with:

Law enforcement agencies in connection with any investigation to help prevent unlawful activity

PeopleKeys for DISC personality profiling - email address

The Coaching Academy that supplies DISC personality assessments

PayPal for payment purposes personal data e.g. name, email address

MailChimp for email opt-ins

Walker Websites - website developer

We will not share you personal information with any other 3rd parties.

Marketing

We would like to send you information about products, services, offers, competitions and our business which may be of interest to you. Such information could be sent by post, email, telephone, text message or automated call.

We will ask whether you would like us to send you marketing messages on the first occasion that you provide any relevant contact information (i.e. on purchase, signing up to a newsletter, entering a competition etc). If you do opt in to receive such marketing from us you can opt out at any time (see 'What rights do you have?' below for further information). If you have any queries about how to opt out, or if you are receiving messages you do not want you can contact us using the details provided below.

Whether personal information has to be provided by you, and if so why

No personal information has to be provided by you to us at any time.

How long your personal information will be kept

We will hold your personal information for the following periods:

Name and address will be kept for 6 years to satisfy UK tax law. Email address as soon as an email receipt is sent your email address will be deleted unless it is necessary for the performance of a contract or you have opted in to receive marketing messages. If you do not require our services your phone number will be deleted.

These periods are no longer than necessary in each case.

Reasons we can collect and use your personal information

We rely on the following as the lawful basis on which we collect and use your personal information:

consent

contract

legal obligation

legitimate interests

The legitimate interests relied upon are as follows:

The information is for marketing purposes, the impact on privacy is minimal and it is necessary to the business.

Consequence of our use of your personal information

The consequence to you of our use of your personal information is:

To perform the contract for our products/services with you. To manage payments, fees and charges. To manage our relationship with you. To administer and protect our business and this website. To use data analytics to improve our website, products/services, marketing, customer relationships and experience. To make suggestions and recommendations to you about goods or services you may be interested in.

Keeping your information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We will also use technological and organisation measures to keep your information secure. These measures may include the following examples:

We use third-party services for payment processing. We will not store or collect payment card details. That information is provided directly to our third-party payment processor whose use of your personal data is governed by their Privacy Policy. The

payment processor we work with is PayPal. We also use third parties for DISC personality assessments and profiles, website development and email marketing.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Indeed, while we will use all reasonable efforts to secure your personal data, in using the site you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data that are transferred from you or to you via the internet. If you have any particular concerns about your information, please contact us using the details below.

Transfers of your information out of the EEA

We will not transfer your personal information outside of the EEA at any time.

Children and the validity of consent

Where we obtain consent from any user we will take reasonable steps to ascertain whether the user is over 13 years of age and whether the child is sufficiently informed to give valid consent. If the user is not, parental consent will be required to provide consent for the processing of any personal information.

What rights do you have?

Under the General Data Protection Regulation you have a number of important rights free of charge. In summary, those include rights to:

- fair processing of information and transparency over how we use your use personal information
- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address
- require us to correct any mistakes in your information which we hold
- require the erasure of personal information concerning you in certain situations
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal information concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you

- object in certain other situations to our continued processing of your personal information
- otherwise restrict our processing of your personal information in certain circumstances
- claim compensation for damages caused by our breach of any data protection laws

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individual's rights under the General Data Protection Regulations (<http://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>)

If you would like to exercise any of these rights please:

- email, call or write to us
- let us have enough information to identify you
- let us have proof of your identity (a copy of your driving license, passport or a recent credit card/utility bill)
- let us know the information to which your request relates

From time to time we may also have other methods to unsubscribe (opt-out) from any direct marketing including for example, unsubscribe buttons or web links. If such are offered, please note that there may be some period after selecting to unsubscribe in which marketing may still be received while your request is being processed.

How to complain

We hope that we can resolve any query or concern you raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

Changes to the privacy policy

This privacy policy was published on 19/02/2020 and last updated on 19/02/2020.

We may change this privacy policy from time to time. You should check this policy occasionally to ensure you are aware of the most recent version that will apply each time you access this website. We will also attempt to notify users of any changes by:

By a notice on the website

Contacting us

If you have any questions about this policy or the information we hold about you, please contact us by:

e-mail: debra@thinkclearlycoaching.com

post:

415 Stratford High Street, London E15 4QZ

or

telephone: 020 3633 8726

Calls will be answered at the following times:

Monday to Friday 0900-1700

We may record calls for quality and training purposes.