

Empowered House Privacy and Cookies Policy Notice

Empowered House respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website www.empoweredhouse.com (our 'website') (regardless of where you visit it from) and when you provide it to us by other means including but not limited to, when you submit your contact details or make an enquiry with us, as well as informing you about your privacy rights and how the law protects you.

Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how Empowered House collects and processes your personal data. This will include any data you may provide to us when you submit an enquiry to us, or when you share this information with us by email, telephone, mail, in person or otherwise during the Discovery Discussion consultation and the coaching process. This will also cover information we receive from third party platforms when you have shown an interest in coaching with Empowered House. For clients, this will include any data you may provide to us when enquiring about our coaching services or when you share this information with us by email, telephone, mail, in person or otherwise, including contact details for the purpose of providing our services to you.

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

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

Empowered House ('we', 'us' or 'our') is the controller and responsible for your personal data.

We have appointed a data privacy manager (DPM) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights (please see section 9 below), please contact the data privacy manager using the details set out below.

Contact details -

Full name of organisation: Empowered House

Name/Title: Holly Richardson, The Data Privacy Manager

Email address: holly@empoweredhouse.com

Telephone number: 07779 267 062

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 28.03.1983 and historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

Our website 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 notice of every website you visit.

The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes first name, last name, or similar identifier, title, date of birth
- Contact Data includes address, email address and telephone numbers.
- Financial Data includes bank account and payment details.
- Transaction Data includes details about payments to and from you and other details of services provided to you, namely coaching services.
- 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 our website.
- Usage Data includes information about how you use our website and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and your communication preferences.
- Special Categories of Personal Data includes details about your race or ethnicity, religious beliefs, sexual orientation, information about your health and genetic and biometric data.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

Profiling

Profiling is a form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to you, for example to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movement. Please note: we do not currently make use of profiling or take automated decisions based on this.

If you fail to provide personal data

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 the contract we have or are trying to enter into with you for the purposes of coaching services. In this case, we may be unable to provide the coaching services you have requested but we will notify you if this is the case at the time.

How is your personal data collected?

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your Identity, Contact, Profile, Special categories of Personal Data and Financial Data by filling in forms, registering with us, or by corresponding with us by post, phone, email or otherwise. This also includes personal data you may provide when you:
 - wish to become a client or coach;
 - subscribe to our latest opinions, interview, insights and more;
 - are invited to an events;
 - request marketing or information on our services to be sent to you;
 - enter a competition, promotion or survey; or
 - give us some feedback
- Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy provided below for further details.
- Third parties or publicly available sources. We may receive personal data about you from various third parties as set out below:
Technical Data from the following parties:
 1. analytics providers such as Google based outside the EU; and
 2. search information providers based inside the EU.
- Identity, Contact and Profile Data from third parties and publicly available sources such as your social media accounts and networking accounts.

Special Category Data

In the course of our coaching programmes, we may collect the following Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, information about your health and genetic and biometric data). In the event we intend to do so, we will always obtain your explicit consent for any processing of this data.

How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where it is necessary for our legitimate interests (including coaching) and your interests and fundamental rights do not override those interests.
- On the basis of consent for us to provide our coaching services to you.
- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where we need to comply with a legal or regulatory obligation.
- To a purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling.
- To provide you with information on our services, where permitted by law or you have consented to this.

Please note: You have the right to withdraw consent at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the tables below.

Clients:

For clients, we may collect and process your personal data as follows:

Identity data, contact data, profile data and transaction data to register you with us as necessary for our legitimate interest to providing our coaching services to you and on the basis of your explicit consent.

Identity data, contact data, marketing and communications data, to manage our relationship with you, which will include notifying you about changes to our terms or privacy policy, Asking you to leave a review or take a survey. This is necessary to comply with a legal obligation, for our legitimate interests (to keep our records updated and to study how clients use our services) and on the basis of your explicit consent.

Identity and contact data to sign you up for seminars and events at your request,

which is necessary for our legitimate interests to provide a wide range of services to you to enable our business to grow and on the basis of explicit consent.

Identity data, contact data, financial data, transaction data, marketing and communications data to carry out invoicing activities in performance of a contract with you and is necessary for our legitimate interests (to recover debts and fees due to us)

Identity Data, Contact Data, Usage Data, Marketing and Communications Data and Technical Data to deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you which is necessary for our legitimate interests (to study how clients use our services, to develop them, to grow our business and to inform our marketing strategy)

Identity Data, Contact Data, Profile Data, Usage Data, Marketing and Communications Data, Technical Data, Financial Data and Transaction Data necessary for our legitimate interest to provide our coaching services to you and performance of a contract with you.

Identity Data, Contact Data, Technical Data and Usage Data to make suggestions and recommendations to you about services that may be of interest to you which is necessary for our legitimate interests (to develop our services and grow our business)

Identity Data, Contact Data, Profile Data and Transaction Data to contact you via third party platforms or process your responses to posts on third party platforms which is necessary for our legitimate interests to respond to your applications and keep you informed of coaching services.

Identity Data, Contact Data, Profile Data, Usage Data and Marketing and Communications Data on the basis of your explicit consent to enable you to partake in a prize draw, competition or complete a survey which is necessary for our legitimate interests (to study how clients use our services, to develop them and grow our business) and in performance of a contract with you.

For website users, we may collect and process your personal data as follows:

Technical Data to administer and protect our business (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) as is necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) and necessary to comply with a legal obligation.

Usage Data, Marketing and Communications Data, Technical Data to deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you and is necessary for our legitimate interests (to study how individuals use our website, to develop it, to grow our business and to inform our marketing strategy)

Technical Data and Usage Data to use data analytics to improve our website, services, marketing, customer relationships and experiences as is necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

Identity Data, Contact Data, Technical Data and Usage Data to make suggestions and recommendations to you about services that may be of interest to you as is necessary for our legitimate interests (to develop our services and grow our business)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services may be relevant for you (we call this marketing). You will receive marketing communications from us if you have requested information from us (provided consent), we have provided our coaching services to you (either as a client or prospective client) or registered your details with us and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We do not share your personal data with third parties for marketing purposes.

New Clients

As part of running our business and within our legitimate interests, we may try and engage with you as a new client, to see if we would benefit from working together in future. If we do this, we will always ensure you are happy to continue as well as providing details of our intention, ensuring this Policy is available and giving you the opportunity to unsubscribe.

Opting out

You can ask us to stop sending you marketing messages at any time by contacting us. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, registering with us as a client for our coaching services or service experience.

COOKIES

What's a cookie?

A "cookie" is a piece of information that is stored on your computer's hard drive and which records your navigation of a website so that, when you revisit that website, it can present tailored options based on the information stored about your last visit. Cookies can also be used to analyse traffic and for advertising and marketing purposes. Cookies are used by nearly all websites and do not harm your system. If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings.

How do we use cookies?

We use cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website. By continuing to browse this website, you are agreeing to our use of cookies.

Cookies are either:

- Session cookies: these are only stored on your computer during your web session and are automatically deleted when you close your browser – they usually store an anonymous session ID allowing you to browse a website without having to log in to each page but they do not collect any information from your computer; or
- Persistent cookies: a persistent cookie is stored as a file on your computer and it remains there when you close your web browser. The cookie can be read by the websites that created it when you visit that website again. We may use persistent cookies for Google Analytics and for personalisation (see below).

Cookies can also be categorised as follows:

- Strictly necessary cookies: These cookies are essential to enable you to use our website effectively, such as when registering on our website, and therefore cannot be turned off. Without these cookies, the services available to you on our website cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.
- Performance cookies: These cookies enable us to monitor and improve the performance of our website. For example, they allow us to count visits, identify traffic sources and see which parts of the website are most popular.
- Functionality cookies: These cookies allow our website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced features. For instance, we may be able to provide you with news or updates relevant to the services you use. These cookies can also be used to remember changes you have made to text size, font and other parts of web pages that you can customise. They may also be used to provide services you have requested such as viewing a video or commenting on a blog. The information these cookies collect is usually anonymised.
- Personalisation cookies: These cookies help us to provide our services specific to you. These cookies are persistent (for as long as you are registered with us) and mean that when you log in or return to our website, you may see information similar to that you have previously browsed.

The following Cookies and third-party tracking are active on our website:

Data protection provisions about the application and use of Facebook and

Instagram

On this website, the controller has integrated components of the enterprise Facebook and Instagram. Facebook and Instagram are social network channels. A social network is a place for social meetings on the Internet, an online community, which usually allows users to communicate with each other and interact in a virtual space. A social network may serve as a platform for the exchange of opinions and experiences, or enable the Internet community to provide personal or business-related information. Facebook and Instagram allow social network users to include the creation of private profiles, upload photos, and network through friend requests and followers.

The operating company of Facebook is Facebook, Inc., 1 Hacker Way, Menlo Park, CA 94025, United States. If a person lives outside of the United States or Canada, the controller is the Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland. The same addresses relate to Instagram.

With each call-up to one of the individual pages of this Internet website, which is operated by the controller and into which a Facebook component (Facebook/Instagram plug-ins) was integrated, the web browser on the information technology system of the data subject is automatically prompted to download display of the corresponding Facebook/Instagram component from Facebook/Instagram through the Facebook/Instagram component. An overview of all the Facebook Plug-ins may be accessed under <https://developers.facebook.com/docs/plugins/>. During the course of this technical procedure, Facebook/Instagram is made aware of what specific sub-site of our website was visited by the data subject.

If the data subject is logged in at the same time on Facebook/Instagram, Facebook/Instagram detects with every call-up to our website by the data subject - and for the entire duration of their stay on our Internet site – which specific sub-site of our Internet page was visited by the data subject. This information is collected through the Facebook/Instagram component and associated with the respective Facebook/Instagram account of the data subject. If the data subject clicks on one of the Facebook/Instagram buttons integrated into our website, e.g. the “Like” button, or if the data subject submits a comment, then Facebook/Instagram matches this information with the personal Facebook/Instagram user account of the data subject and stores the personal data.

Facebook/Instagram always receives, through the Facebook/Instagram component, information about a visit to our website by the data subject, whenever the data subject is logged in at the same time on Facebook/Instagram during the time of the call-up to our website. This occurs regardless of whether the data subject clicks on the Facebook/Instagram component or not. If such a transmission of information to Facebook/Instagram is not desirable for the data subject, then he or she may prevent this by logging off from their Facebook/Instagram account before a call-up to our website is made.

The data protection guideline published by Facebook, which is available at <https://facebook.com/about/privacy/>, provides information about the collection, processing and use of personal data by Facebook.

The data protection guideline

published by Instagram can be viewed at
<https://help.instagram.com/519522125107875>

In addition, it is explained there what setting options each company offers to protect the privacy of the data subject. In addition, different configuration options are made available to allow the elimination of data transmission to these social media networks. These applications may be used by the data subject to eliminate a data transmission to Facebook and/or Instagram.

Data protection provisions about the application and use of Google Analytics (with anonymization function)

On this website, the controller has integrated the component of Google Analytics (with the anonymizer function). Google Analytics is a web analytics service. Web analytics is the collection, gathering, and analysis of data about the behaviour of visitors to websites. A web analysis service collects, inter alia, data about the website from which a person has come (the so-called referrer), which sub-pages were visited, or how often and for what duration a sub-page was viewed. Web analytics are mainly used for the optimisation of a website and in order to carry out a cost-benefit analysis of Internet advertising.

The operator of the Google Analytics component is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, United States.

For the web analytics through Google Analytics the controller uses the application “_gat. _anonymizep”. By means of this application the IP address of the Internet connection of the data subject is abridged by Google and anonymised when accessing our websites from a Member State of the European Union or another Contracting State to the Agreement on the European Economic Area.

The purpose of the Google Analytics component is to analyse the traffic on our website. Google uses the collected data and information, inter alia, to evaluate the use of our website and to provide online reports, which show the activities on our websites, and to provide other services concerning the use of our Internet site for us. Google Analytics places a cookie on the information technology system of the data subject.

The definition of cookies is explained above. With the setting of the cookie, Google is enabled to analyse the use of our website. With each call-up to one of the individual pages of this Internet site, which is operated by the controller and into which a Google Analytics component was integrated, the Internet browser on the information technology system of the data subject will automatically submit data through the Google Analytics component for the purpose of online advertising and the settlement of commissions to Google. During the course of this technical procedure, the enterprise Google gains knowledge of personal information, such as the IP address of the data subject, which serves Google, inter alia, to understand the origin of visitors and clicks, and subsequently create commission settlements.

The cookie is used to store personal information, such as the access time, the location from which the access was made, and the frequency of visits of our website by the data subject. With each visit to our Internet site, such personal data, including the IP address of the Internet access used by the data subject, will be transmitted to Google in the United States of America. These personal data are stored by Google in the

United States of America. Google may pass these personal data collected through the technical procedure to third parties. The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent Google Analytics from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by Google Analytics may be deleted at any time via a web browser or other software programs.

In addition, the data subject has the possibility of objecting to a collection of data that are generated by Google Analytics, which is related to the use of this website, as well as the processing of this data by Google and the chance to preclude any such. For this purpose, the data subject must download a browser add-on under the link - <https://tools.google.com/dlpage/gaoptout> and install it. This browser add-on tells Google Analytics through a JavaScript, that any data and information about the visits of Internet pages may not be transmitted to Google Analytics. The installation of the browser add-ons is considered an objection by Google. If the information technology system of the data subject is later deleted, formatted, or newly installed, then the data subject must reinstall the browser add-ons to disable Google Analytics. If the browser add-on was uninstalled by the data subject or any other person who is attributable to their sphere of competence, or is disabled, it is possible to execute the reinstallation or reactivation of the browser add-ons.

Further information and the applicable data protection provisions of Google may be retrieved under <https://www.google.com/intl/en/policies/privacy/> and under <http://www.google.com/analytics/terms/us.html>. Google Analytics is further explained under the following Link <https://www.google.com/analytics/>.

Data protection provisions about the application and use of LinkedIn

The controller may have integrated components of the LinkedIn Corporation on this website. LinkedIn is a web-based social network that enables users with existing business contacts to connect and to make new business contacts. Over 400 million registered people in more than 200 countries use LinkedIn. Thus, LinkedIn is currently the largest platform for business contacts and one of the most visited websites in the world.

The operating company of LinkedIn is LinkedIn Corporation, 2029 Stierlin Court Mountain View, CA 94043, UNITED STATES. For privacy matters outside of the UNITED STATES LinkedIn Ireland, Privacy Policy Issues, Wilton Plaza, Wilton Place, Dublin 2, Ireland, is responsible.

With each call-up to one of the individual pages of this Internet site, which is operated by the controller and on which a LinkedIn component (LinkedIn plug-in) was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to the download of a display of the corresponding LinkedIn component of LinkedIn. Further information about the LinkedIn plug-in may be accessed under <https://developer.linkedin.com/plugins>.

During the course of this technical procedure, LinkedIn gains knowledge of what

specific sub-page of our website was visited by the data subject. If the data subject is logged in at the same time on LinkedIn, LinkedIn detects with every call-up to our website by the data subject—and for the entire duration of their stay on our Internet site—which specific sub-page of our Internet page was visited by the data subject. This information is collected through the LinkedIn component and associated with the respective LinkedIn account of the data subject. If the data subject clicks on one of the LinkedIn buttons integrated on our website, then LinkedIn assigns this information to the personal LinkedIn user account of the data subject and stores the personal data.

LinkedIn receives information via the LinkedIn component that the data subject has visited our website, provided that the data subject is logged in at LinkedIn at the time of the call-up to our website. This occurs regardless of whether the person clicks on the LinkedIn button or not. If such a transmission of information to LinkedIn is not desirable for the data subject, then he or she may prevent this by logging off from their LinkedIn account before a call-up to our website is made.

LinkedIn provides under <https://www.linkedin.com/psettings/guest-controls> the possibility to unsubscribe from e-mail messages, SMS messages and targeted ads, as well as the ability to manage ad settings. LinkedIn also uses affiliates such as Eire, Google Analytics, BlueKai, DoubleClick, Nielsen, Comscore, Eloqua, and Lotame. The setting of such cookies may be denied under - <https://www.linkedin.com/legal/cookie-policy>.

The applicable privacy policy for LinkedIn is available under <https://www.linkedin.com/legal/privacy-policy>.

The LinkedIn Cookie Policy is available under <https://www.linkedin.com/legal/cookie-policy>.

Data protection provisions about the application and use of Twitter

On this website, the controller may have integrated components of Twitter. Twitter is a multilingual, publicly-accessible microblogging service on which users may publish and spread so-called 'tweets,' e.g. short messages, which are limited to 140 characters. These short messages are available for everyone, including those who are not logged on to Twitter. The tweets are also displayed to so-called followers of the respective user. Followers are other Twitter users who follow a user's tweets. Furthermore, Twitter allows you to address a wide audience via hashtags, links or retweets.

The operating company of Twitter is Twitter, Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, UNITED STATES.

With each call-up to one of the individual pages of this Internet site, which is operated by the controller and on which a Twitter component (Twitter button) was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to download a display of the corresponding Twitter component of Twitter. Further information about the Twitter buttons is available under <https://about.twitter.com/de/resources/buttons>. During the course of this technical procedure, Twitter gains knowledge of what specific sub-page of our

website was visited by the data subject. The purpose of the integration of the Twitter component is a retransmission of the contents of this website to allow our users to introduce this web page to the digital world and increase our visitor numbers. If the data subject is logged in at the same time on Twitter, Twitter detects with every call-up to our website by the data subject and for the entire duration of their stay on our Internet site which specific sub-page of our Internet page was visited by the data subject. This information is collected through the Twitter component and associated with the respective Twitter account of the data subject. If the data subject clicks on one of the Twitter buttons integrated on our website, then Twitter assigns this information to the personal Twitter user account of the data subject and stores the personal data.

Twitter receives information via the Twitter component that the data subject has visited our website, provided that the data subject is logged in on Twitter at the time of the call-up to our website. This occurs regardless of whether the person clicks on the Twitter component or not. If such a transmission of information to Twitter is not desirable for the data subject, then he or she may prevent this by logging off from their Twitter account before a call-up to our website is made.

The applicable data protection provisions of Twitter may be accessed under <https://twitter.com/privacy?lang=en>.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the tables in paragraph 4 above.

- Internal third parties such as, our employees or officers who are based in the United Kingdom and provide IT and/or system administration services.
- External third parties such as:
 - specialist IT support, suppliers and sub-contractors for the performance of our website and for our software, mobile phones, computers, laptops and other IT systems; including Office 365 and Google G-Suite;
 - providers of event management and ticketing services including, but not limited to, Event Brite;
 - other outsourced service providers
 - professional advisers including lawyers, bankers, accountants and

insurers who provide consultancy, banking, legal, insurance and accounting services;

○ 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. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International Transfers

We do not usually transfer personal data outside the European Economic Area (EEA). In the event we need to transfer your data outside the EEA we will ensure it is to countries which either have an adequate level of protection for personal data, as determined by the European Commission, or we have ensured that adequate safeguards are in place, for example Privacy Shield or specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

Please note that our employees and officers will also be able to access emails and our IT systems whilst outside the EEA, in the course of their employment. This does mean that your personal data is accessible whilst outside the EU, however, we have assessed the risk and ensured adequate safeguards are in place.

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 employees, agents, contractors and other 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.

Data retention

How long will you use my personal data for?

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, contractual and/or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We will usually keep data for a maximum of 7 years and for full details of our retention strategy you can request it by contacting us.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data as follows:

- Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time

you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

Right to complain

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

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. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

GLOSSARY

Please use the Glossary below to help understand the meaning of some of the terms used in this privacy notice.

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract to which you are a party.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Client means an individual for whom Empowered House processes their data when providing coaching services and on the terms of this Privacy and Cookies Notice.