



1) How we use your personal data

We are committed to protecting your personal data, which means any information capable of identifying you as an individual. It does not include anonymised data. Our legal ground of processing this data is with your explicit consent. The data we collect from you is as submitted by you via our website, mailing list or directly as part of registering you onto one of our Coaching services. We may automatically collect certain data from you as you use our website by using cookies and similar technologies.

We will use your non-sensitive personal data to

- i. Register you as a new client,
- ii. Manage payment,
- iii. Collect and recover monies owed to us
- iv. Manage our delivery of service and relationship with you,
- v. Send you details of our goods and services.

Our legal grounds for processing your data are in relation to points (i) to (iv) above are for performance of a contract with you and in relation to (iii) and (v) above, necessary for our legitimate interests to develop our products/services and grow our business and to recover monies owed.

For coaching clients, we will also ask for your full contact details and require that you give your consent to us storing and using this information by signing an agreement form. We will store basic contact data about you held securely on our server, used solely for the purposes of us carrying out our obligations to you as our client. Any information you send us in an email will be kept within that email record. We will also keep records of our coaching conversation in note form. Handwritten notes will be held in a physical file, held securely within our offices. Brief notes will be typed up after each session and copies of these will be sent to you by email.

We may also process the following categories of personal data about you:

- **Communication Data** that includes any communication that you send to us whether that be through the contact form on our website, through email, text, social media messaging, social media posting or any other communication that you send us. We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defence of legal claims. Our lawful ground for this processing is our legitimate interests which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.
- **Customer Data** that includes data relating to any purchases of goods and/or services such as your name, title, billing address, delivery address email address, phone number, contact details, purchase details and your card details. We process this data to supply the goods and/or services you have purchased and to keep records of such transactions. Our lawful ground for this processing is the performance of a contract between you and us and/or taking steps at your request to enter into such a contract.
- **User Data** that includes data about how you use our website and any online services together with any data that you post for publication on our website or through other online services. We process this data to operate our website and ensure relevant content



is provided to you, to ensure the security of our website, to maintain back-ups of our website and/or databases and to enable publication and administration of our website, other online services and business. Our lawful ground for this processing is our legitimate interests, which in this case are to enable us to properly administer our website and our business.

- **Technical Data** that includes data about your use of our website and online services such as your IP address, your login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website. We process this data to analyse your use of our website and other online services, to administer and protect our business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness of our advertising. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business, to grow our business and to decide our marketing strategy.
- **Marketing Data** that includes data about your preferences in receiving marketing from us and our third parties and your communication preferences. We process this data to enable you to partake in our promotions such as competitions, prize draws and free give-aways, to deliver relevant website content and advertisements to you and measure or understand the effectiveness of this advertising. Our lawful ground for this processing is our legitimate interests which in this case are to study how customers use our products/services, to develop them, to grow our business and to decide our marketing strategy.

We may use Customer Data, User Data, Technical Data and Marketing Data to deliver relevant website content and advertisements to you and to measure or understand the effectiveness of the advertising we serve you. We may also use such data to send other marketing communications to you. Our lawful ground for this processing is either consent or legitimate interests (namely to grow our business).

Under the Privacy and Electronic Communications Regulations, we may send you marketing communications from us if (i) you made a purchase or asked for information from us about our goods or services or (ii) you agreed to receive marketing communications and in each case you have not opted out of receiving such communications since. Under these regulations, if you are a limited company, we may send you marketing emails without your consent. However you can still opt out of receiving marketing emails from us at any time.

You can ask us to stop sending you marketing messages at any time by

- 1) **Unsubscribing from our mailing list:** <https://tinyurl.com/y6u3taps>
- 2) **Emailing us at any time:** hello@acceleratedchange.guru

If you opt out of receiving marketing communications this opt-out does not apply to personal data provided as a result of other transactions, such as purchases, warranty registrations etc.

We may receive data from third parties such as analytics providers such as Google based outside the EU, advertising networks such as Facebook based outside the EU, such as search information providers such as Google based outside the EU, providers of technical, payment and delivery services, such as data brokers or aggregators. We may also receive data from publicly available



sources such as Companies House and the Electoral Register based inside the EU.

We do not collect any Sensitive Data about you. Sensitive data refers to data that includes details 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. We do not collect any information about criminal convictions and offences.

We will not share your details with third parties for marketing purposes except with your express consent.

2) Disclosure of your personal data

We may have to share your personal data with

- I. Service providers who provide IT and system administration support,
- II. Professional advisors including lawyers, bankers, auditors and insurers
- III. HMRC and other regulatory authorities
- IV. Associate Coaches delivering services on behalf of Accelerated Change

We require all of these third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. They are only allowed to process your personal data on our instructions.

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.

3) International transfers

We currently do not have any third party providers outside of the EEA. Should this change then we are aware that they do not always offer the same levels of protection for your personal data. We will therefore do our best to ensure a similar degree of security by ensuring that contracts, code of conduct or certification are in place which give your personal data the same protection it has within Europe. If we are not able to do so, we will request your explicit consent to the transfer and you can withdraw this consent at any time.

4) Data security

We have put in place security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We also limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions and are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breaches and will notify you and any applicable regulator where we are legally required to do so.

In certain circumstances you can ask us to delete your data. See the section entitled 'your rights' below for more information.

Privacy Policy

Updated: May 2018



Accelerated Change

We may anonymise your personal data (so that you can no longer be identified from such data) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

5) Data retention

We will only keep your personal data for as long as is necessary to fulfil the purposes for which we collected it. We may retain your data to satisfy any legal, accounting, or reporting requirements so for example we need to keep certain information about you for 6 years after you cease to be a client for tax purposes. You have the right to ask us to delete the personal data we hold about you in certain circumstances. See section 6 below.

6) Your rights

You are able to exercise certain rights in relation to your personal data that we process. These are set out in more detail at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

In relation to a Subject Access Right request, you may request that we inform you of the data we hold about you and how we process it. We will not charge a fee for responding to this request unless your request is clearly unfounded, repetitive or excessive in which case we may charge a reasonable fee or decline to respond.

We will, in most cases, reply within one month of the date of the request unless your request is complex or you have made a large number of requests in which case we will notify you of any delay and will in any event reply within 3 months.

If you wish to make a Subject Access Request, please send the requests marked for the attention of the Company Directors (Michelle Wyn-Jones or Anna Keep).

Email: hello@acceleratedchange.guru

Address: 207 Knutsford Rd, Warrington WA4 2QL

Tel: 07717 856551 / 07769 703621

7) Keeping your data up to date

We have a duty to keep your personal data up to date and accurate so from time to time we will contact you to ask you to confirm that your personal data is still accurate and up to date. If there are any changes to your personal data (such as a change of address) please let us know as soon as possible by emailing hello@acceleratedchange.guru

8) Complaints

We are committed to protecting your personal data but if for some reason you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.