

## My Sach Privacy Statement

### 1. Introduction

This privacy notice provides you with details of how I collect and process your personal data through your use of my site **My Sach Coaching**

By providing me with your data, you warrant to me that you are over 13 years of age.

**Ramanjit Janack is the** founder of My Sach Coaching and is the data controller and is responsible for your personal data.

My contact details:

[contact@mysachcoaching.com](mailto:contact@mysachcoaching.com)

It is very important that the information I hold about you is accurate and up to date. Please let me know if at any time your personal information changes by emailing me using my web form

### 2. What data I collect about you, for what purpose and what ground I process it.

Personal data means any information capable of identifying an individual. It does not include anonymised data.

I may process the following categories of personal data about you:

- **Communication Data** that includes any communication that you send to me whether that be through the contact form on my website, through email, text, social media messaging, social media posting or any other communication that you send me. I process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defence of legal claims. My lawful ground for this processing is my legitimate interests which in this case are to reply to communications sent to me, 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. I process this data to supply the goods and/or services you have purchased and to keep records of such transactions. My lawful ground for this processing is the performance of a contract between you and me and/or taking steps at your request to enter into such a contract.
- **User Data** that includes data about how you use my website and any online services together with any data that you post for publication on my website or through other online services. I process this data to operate my website and ensure relevant content is provided to you, to ensure the security of my website, to maintain back-ups of my website and/or databases and to enable publication and administration of my website, other online services and business. My lawful ground for this processing is my legitimate interests which in this case are to enable me to properly administer my website and my business.
- **Technical Data** that includes data about your use of my website and online services such as your IP address, your login data, details about your browser, length of visit to

pages on my website, page views and navigation paths, details about the number of times you use my website, time zone settings and other technology on the devices you use to access my website. The source of this data is from my analytics tracking system. I process this data to analyse your use of my website and other online services, to administer and protect my business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness of my advertising. My lawful ground for this processing is my legitimate interests which in this case are to enable me to properly administer my website and my business and to grow my business and to decide my marketing strategy.

- **Marketing Data** that includes data about your preferences in receiving marketing from me and my third parties and your communication preferences. I process this data to enable you to partake in my promotions such as competitions, prize draws and free giveaways, to deliver relevant website content and advertisements to you and measure or understand the effectiveness of this advertising. My lawful ground for this processing is my legitimate interests which in this case are to study how customers use my products/services, to develop them, to grow my business and to decide my marketing strategy.
- I may use Customer Data, User Data, Technical Data and Marketing Data to deliver relevant website content and advertisements to you (including Facebook adverts or other display advertisements) and to measure or understand the effectiveness of the advertising I serve you. My lawful ground for this processing is legitimate interests which is to grow my business. I may also use such data to send other marketing communications to you. My lawful ground for this processing is either consent or legitimate interests (namely to grow my business).

### **Sensitive Data**

I 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. I do not collect any information about criminal convictions and offences.

Where I am required to collect personal data by law, or under the terms of the contract between me and you do not provide me with that data when requested, I may not be able to perform the contract (for example, to deliver goods or services to you). If you don't provide me with the requested data, I may have to cancel a product or service you have ordered but if I do, I will notify you at the time.

When entering into a contract with me, you may choose to provide, in the course of my discussions, the following sensitive data about you, in order to provide you with work-life balance, time management, and wellbeing coaching:

- Information about your health
- Information about work and lifestyle, which may include details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions

I require your explicit consent for processing sensitive data, so when you submit your details, I will send you a further communication asking for you to confirm your consent to this processing.

Where I am required to collect personal data by law, or under the terms of the contract between me and you do not provide me with that data when requested, I may not be able to perform the contract (for example, to deliver goods or services to you). If you don't provide me with the requested data, I may have to cancel a product or service you have ordered but if I do, I will notify you at the time.

I will only use your personal data for a purpose it was collected for or a reasonably compatible purpose if necessary. For more information on this please email me via my email; [contact@mysachcoaching.com](mailto:contact@mysachcoaching.com). In case I need to use your details for an unrelated new purpose I will let you know and explain the legal grounds for processing.

I may process your personal data without your knowledge or consent where this is required or permitted by law.

I do not carry out automated decision making or any type of automated profiling.

### **3. How I collect your personal data**

I may collect data about you by you providing the data directly to me (for example by filling in forms on my site or by sending me emails). I may automatically collect certain data from you as you use my website by using cookies and similar technologies.

I 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.

I may also receive data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

You have provided me with your data at one of my talks, seminars, workshops, webinars or Facebook group. You may have also provided me with your data through a contact form of a coaching directory/listing or booked an appointment via my online scheduling system.

### **4. Marketing Communications**

My lawful ground of processing your personal data to send you marketing communications is either your consent or my legitimate interests (namely to grow my business).

Under the Privacy and Electronic Communications Regulations, I may send you marketing communications from me if (i) you made a purchase or asked for information from me about my 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, I may send you marketing emails without your consent. However, you can still opt out of receiving marketing emails from me at any time.

Before I share your personal data with any third party for their own marketing purposes I will get your express consent.

You can ask me or third parties to stop sending you marketing messages at any by following the opt-out links on any marketing message sent to you OR by emailing me via my email; [contact@mysachcoaching.com](mailto:contact@mysachcoaching.com)

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.

## **5. Disclosures of Your Personal Data**

I may have to share your personal data with the parties set out below:

- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers
- Government bodies that require me to report processing activities.
- Third parties to whom I sell, transfer, or merge parts of my business or my assets.

I require all third parties to whom I transfer your data to respect the security of your personal data and to treat it in accordance with the law. I only allow such third parties to process your personal data for specified purposes and in accordance with my instructions.

## **6. International Transfers**

Countries outside of the European Economic Area (EEA) do not always offer the same levels of protection to your personal data, so European law has prohibited transfers of personal data outside of the EEA unless the transfer meets certain criteria.

Many of my third parties service providers are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever I transfer your personal data out of the EEA, I do my best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is in place:

- I will only transfer my personal data to countries that the European Commission have approved as providing an adequate level of protection for personal data by; or
- Where I use certain service providers, I may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or
- If I use US-based providers that are part of EU-US Privacy Shield, I may transfer data to them, as they have equivalent safeguards in place.

If none of the above safeguards is available, I may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

## **7. Data Security**

I have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. I also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on my instructions and they must keep it confidential.

I have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if I are legally required to.

## **8. Data Retention**

I will only retain your personal data for as long as necessary to fulfil the purposes I collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

When deciding what the correct time is to keep the data for I look at its amount, nature and sensitivity, the potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

For tax purposes, the law requires me to keep basic information about my customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers.

In some circumstances, I may anonymise your personal data for research or statistical purposes in which case I may use this information indefinitely without further notice to you.

## **9. Your Legal Rights**

Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to the portability of data and (where the lawful ground of processing is consent) to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email me via my email; [contact@mysachcoaching.com](mailto:contact@mysachcoaching.com)

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 or refuse to comply with your request in these circumstances.

I may need to request specific information from you to help me 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. I may also contact you to ask you for further information in relation to your request to speed up my response.

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

If you are not happy with any aspect of how I 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](http://www.ico.org.uk)). I should be grateful if you would contact me first if you do have a complaint so that I can try to resolve it for you.

## **10. Third-Party Links**

This 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. I do not control these third-party websites and are not responsible for their privacy statements. When you leave my website, I encourage you to read the privacy notice of every website you visit.

## **11. Cookies**

You can set your browser to refuse all or some browser cookies or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.