

Aridiculouslife.com

Privacy Notice

1 Keeping your data safe

1.1 We are committed to keeping your personal data safe and secure and handling it in accordance with our legal obligations. This privacy notice sets out the purposes for which we process your personal data, who we share it with, what rights you have in relation to that data and everything else we think it's important for you to know.

2 Who's in control of my personal data

2.1 JD Speaking and Strategy Limited (**we**, **us**, **our**) is the "controller" of all personal data that we collect and use about you. This means that we are responsible for deciding how and why your data is used and for ensuring that your data is handled legally and safely.

3 What data do you collect and where from?

- 3.1 We collect personal data directly from you in the following circumstances:
 - 3.1.1 when you download free content from our website, we collect your name and email address;
 - 3.1.2 when you contact us using the contact form on our website, we collect your name, email address, telephone number (if you choose to give us this), information about the programme you are interested in and information that you choose to provide about what you are hoping to accomplish;
 - 3.1.3 if you become a client, we will also collect personal data about you for the purpose of registering you as a client, as well as information that you choose to provide throughout the course of working with us. We collect this information through a mix of face-to-face contact and asking you to complete forms before sessions so that we can tailor our sessions appropriately to your needs. You are in control of the information that you provide to us. If you give us information about you that is particularly sensitive, including but not limited to information about your health, you must make sure that you are happy for us to use that information to provide and tailor our services to you;
 - 3.1.4 if we offer the option to purchase goods or paid-for digital content via our website and you purchase something, or we offer an option for you to pay for services through our website, we will collect your name, address, email address and telephone number to process your order. We will use a payment gateway to collect and process your payment details;
 - 3.1.5 if you post a comment on a blog on our website, we will collect the email address that you provide when posting that comment and any personal data that you leave in the comment;
 - 3.1.6 if you contact us by email, post or telephone, we will use any personal data that you provide to us in the course of that contact or any further correspondence to handle your correspondence and your queries; and
 - 3.1.7 we collect some technical data about how you use our website. Please see our cookies policy for more details.
- 3.2 We offer video conferencing options for our clients. If you choose to meet us by video conference and to record the call, your video footage will be recorded and you can



download the footage. You can choose whether you download the footage to your own computer or to the cloud storage service provided by our video conferencing provider.

- 3.3 If we offer online group courses and you choose to participate in a session by video conference, the conference, including your video and any participation by you, will be recorded and will be available to be downloaded from our website only by participants in that particular session.
- 3.4 If you are a company and you use our services to provide coaching for your employees, if you or they give us any personal data about those employees, you must make sure you have made your employees aware that we will process their personal data in accordance with this privacy notice.

4 What do you use my personal data for?

- 4.1 We use your personal data for the following purposes:
 - 4.1.1 to provide our services to you if you are a client and to ensure that our services are appropriately tailored to your needs and objectives, including to take payment from you for our services;
 - 4.1.2 to communicate with you and respond to your queries and handle any issues that you may raise;
 - 4.1.3 to send you relevant newsletters and updates, where you have signed up for these;
 - 4.1.4 to monitor comments posted on blogs on our website to ensure that they are not illegal, harmful, inappropriate or spam;
 - 4.1.5 to process any orders that you make via our website and provide you with the products you have ordered; and
 - 4.1.6 to monitor trends and to analyse and improve our website and our business.

5 What is your legal basis for using my personal data?

5.1 Under data protection law, we are required to have a "legal basis" in place to process your personal data and to tell you what this is. We have set out below the legal bases that we rely on to process your personal data and some further explanation about what this means.

Purpose	Personal data used	Legal basis
Providing our services to you and tailoring our services to your needs and objectives, taking payment from you for our services	Name, email address, telephone number, postal address, other information that you provide throughout the course of working with us	We process this personal data for this purpose on the basis that this information is necessary in order to perform our contract with you to provide our services.
Communicating with you, responding to your queries and	Name, contact details, other information that you provide in your	We process this personal data for this purpose on the basis that it is necessary in our legitimate interests. We have a legitimate interest in ensuring that correspondence is handled



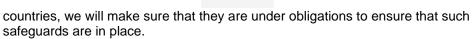
handling issues that you raise	correspondence with us	properly so that our contacts, clients and prospective clients are happy with our service.
Sending you relevant newsletters and updates	Name, email address	 We process this personal data either on the basis that: you are an existing client and it is in our legitimate interests to provide relevant updates to ensure that our clients are kept up-to-date about our products and services, as we have a legitimate interest in promoting our business; if you are not an existing client, you have consented to us sending you such updates by signing up to receive such updates.
Processing orders that you make via our website and providing you with products you have ordered	Name, email address, telephone number, postal address	We process this personal data for this purpose on the basis that this information is necessary in order to perform our contract with you to provide the products ordered.
Monitoring trends and analysing and improving our business	Technical data collected on our website	We process this personal data for this purpose on the basis that this is necessary in our legitimate interests. We have a legitimate interest in knowing about how people use our website so that we can monitor and improve our website and our business.

6 Who do you share my personal data with?

- 6.1 We do not share personal data without your consent except in the following circumstances:
 - 6.1.1 with contractors or temporary workers we engage to work in our business. These types of workers are treated in a similar way to our employees and are subject to confidentiality obligations;
 - 6.1.2 with third party service providers that we use in order to conduct our business and provide our website, such as website developers, hosting providers and our video conferencing provider; or
 - 6.1.3 where we are required by law or by a regulatory or governmental authority or law enforcement body to share your personal data and where we are entitled to do so by law.

7 Whereabouts is my personal data kept?

- 7.1 Our website is hosted on servers in the EU and our files are stored on a secure cloud server in Luxembourg.
- 7.2 We do not store or transfer your personal data outside the UK and the EEA. If we need to transfer your personal data to a third party located in a country outside the UK and the EEA that does not provide the same level of protection for personal data, we will make sure that there are appropriate safeguards in place to ensure that your personal data is treated in the same way as it would be in the UK and the EEA. Similarly, if any of our third party service providers access data from, or transfer data to, other



8 How long do you keep my personal data for?

- 8.1 If you are a client, we will keep your personal data for as long as you remain a client and for a period of six years thereafter. We need to keep certain personal data for longer than this if we have legal obligations to do so; for example, we need to keep personal data that we process for VAT and accounting purposes (such as your address on an invoice) for a minimum of six years.
- 8.2 If you sign up for our mailing list, we will keep your personal data until you unsubscribe from that mailing list.
- 8.3 If you communicate with us via our website or by other means, we will keep your personal data for a period of six years.

9 What rights do I have?

- 9.1 You have a number of rights under data protection law. These rights and how you can exercise them are set out in this section. We will respond to any requests to exercise your rights as soon as we can and in any event within one month of receiving your request and any necessary proof of identity or further information.
- 9.2 You have the following rights under data protection laws:
 - 9.2.1 a right to ask us to send you a copy of all the personal data that we hold about you (subject to some exceptions);
 - 9.2.2 a right to ask us to send you the information that we hold about you in order to provide our services in a common electronic format, or to ask us to transfer that data to a third party if you want us to and if it is technically feasible for us to do so;
 - 9.2.3 a right to object to us processing any personal data that we process where we are relying on legitimate interests as the legal basis of our processing (we may be able to continue processing your personal data if we have compelling legitimate grounds to do so);
 - 9.2.4 a right to ask us not to send you direct marketing. You can do this by following the "unsubscribe" instructions in any marketing emails or by contacting us using the details below;
 - 9.2.5 a right to ask us to correct inaccurate data that we hold about you. If we are satisfied that the new data you have provided is accurate, we will correct your personal data as soon as possible;
 - 9.2.6 a right to ask us to delete your personal data in certain circumstances, for example if we have processed your data unlawfully or if we no longer need the data for the purposes set out in this privacy notice;
 - 9.2.7 a right to ask us to restrict processing of your personal data in some circumstances, for example if you think the personal data is inaccurate and we need to verify its accuracy, or if we no longer need the data but you require us to keep it so that you can exercise your own legal rights.
 "Restricting your personal data means that we only store your personal data and don't carry out any further processing on it unless you consent or we need to process the data to exercise a legal claim or to protect a third party or the public.



9.3 If you want to exercise any of these rights, please email us at joanna@joannadenton.com.

10 How can I contact you?

10.1 If you have any questions or concerns about this privacy notice and/or our processing of your personal data, you can contact us at joanna@joannadenton.com.

11 What if I have a complaint?

- 11.1 If you are unhappy with how we have processed your personal data, please raise the issue with us in the first instance by using the contact details above. If you are not happy with how we have responded to your complaint, you have a right to complain to the Information Commissioner's Officer (**ICO**), which regulates data protection compliance in the UK, if you are unhappy with how we have processed your personal data.
- 11.2 You can find out how to do this by visiting <u>www.ico.org.uk</u>.

12 What if this policy changes?

12.1 We may make changes to this privacy notice from time to time. Any changes we make will be posted on this page. We may also notify you by email if significant changes are made.

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