1. Our contact details:

Name: Brilliant Horizons Lancashire Ltd, a Limited Company registered in England under company number: 11150353

Registered Address: Unit 16 Eastway Business Village Oliver's Place, Fulwood, Preston, England, PR2 9WT

Postal Address: Oakenhead, Goosnargh Lane, Goosnargh, Preston, PR3 2BN.

Phone Number: 07754 893864

E-mail: andrea@brillianthorizons.co.uk

We are registered with the ICO as a data controller. Registration reference is: ZA707725.

This privacy notice was completed on 20th August 2020 and will be reviewed annually.

2. The type of information we collect:

We collect a variety of data and information before, during and after you contact and book with Brilliant Horizons Lancashire and use any of our services. This may include:

- **Identity information** including first name, last name, title, business name, job title, profession, date of birth and gender.
- **Contact information** including billing address, delivery address, email address and telephone numbers.
- Financial information including bank account and payment card details.
- **Transaction information** including details about payments to and from you and other details of services you have bought from us.
- **Technical information** including 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 this website.
- **Profile information** including your username and password, purchases or orders made by you, preferences, feedback, and survey responses.
- Usage information including information about how you use our website, products and services and a list of URLs starting with a referring site, your activity on the website, and the site you exit to.
- **Marketing and Communication** information including your preferences in receiving marketing from us and your communication preferences.
- Session, evaluation, and review information including:
 - details and notes taken throughout a coaching or training session or service provided, to help us remember conversations during and details of your sessions.
 - details of the duration, frequency, topic and actions of the coaching or training for coaching records, global coach accreditation and coaching supervision purposes.

- details to capture and measure the positive difference the coaching or training may have had either before, during or afterwards. This may include testimonials, case studies, photographs, video, evaluation questionnaires, quotes, well-being measure tools such as the outcomes star, wheel of life, Warwick Edinburgh Mental Wellbeing Scale.
- Email and Social Media information including messages that have been sent to the Brilliant Horizons Lancashire website or social media accounts. These messages are stored for as long as practicable to allow us to provide you with better future services.

3. How we get the personal information and why we have it:

We receive your personal information from various sources when you:

- Voluntarily provide us with your personal details through our website, by telephone, e-mail, or text
- You opt-in to receive marketing communication from us
- Access our social media sites such as LinkedIn, Facebook, Twitter, or Instagram
- Use our website in connection with our services
- Access or use our services
- When you make payments to us

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- To find out about our services and how we can help you
- To request information about our services
- To book a free discovery call
- To apply for and access services
- To secure the coaching and training services
- To confirm the services that have been accessed
- To evaluate and provide feedback on your experiences of the services
- To pay for the services provided
- To continually improve the quality of the coaching or training services
- To promote our services with others who may be interested in accessing services from us
- To meet the essential requirements for the European Mentoring and Coaching Council Global Coach Accreditation, the Global Code of Coaching Ethics and coaching supervision

4. We use the information that you have given us to:

- Make initial contact with you
- Maintain contact with you during the coaching or training services
- Provide and manage your access to our website and services
- Provide our services to you

- Personalise and tailor our services to you
- Send you information on our services, offers and newsletters by email, phone, text, or post that you have opted-in to which can be unsubscribed from at any time
- Promote and advertise our services on our website, marketing materials and social media accounts
- Internally analyse data and information for evaluation, quality, improvement, business, and forecast purposes
- Meet the essential requirements of the Global Code of Coaching Ethics and the European Mentoring and Coaching Council global coach accreditation (discussed in detail in initial meetings and coaching contracting)

For direct marketing to you via e-mail, we will need your consent. You have the right to withdraw consent at any time, please see the section on data protection rights below.

We may share this information with the European Mentoring and Coaching Council to meet the essential requirements of the Global Code of Coaching Ethics and the European Mentoring and Coaching Council global coach accreditation (discussed in detail in initial meetings and coaching contracting).

Under the General Data Protection Regulation (GDPR), the lawful basis we rely on for processing this information the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

Who we may share your data with and why:

We may share your data with the following groups for the following reasons:

- Zoom Video conference services to enable online one to one & group coaching sessions and coaching / training workshops. https://zoom.us/privacy-and-legal
- One Drive File storage for items such as coaching contracts, coaching plans, evaluation forms etc. <u>https://privacy.microsoft.com/en-gb/privacystatement</u>
- Dropbox File storage for items such as global coach accreditation documents, <u>https://www.dropbox.com/en_GB/security/GDPR</u>
- Microsoft Teams Video conference services to enable online one to one coaching sessions. <u>https://docs.microsoft.com/en-gb/microsoft-</u><u>365/compliance/gdpr-dsr-office365?view=o365-worldwide</u>
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities for example invoicing etc.

How we store your personal information:

We will use a range of measures to keep your data safe, these include:

- A secure host organisation for our website.
- Utilising strong password protection and password encryption on the organisation laptop, mobile phone, tablet, folders, and files.
- Keeping any hard copies of organisation documents in a secure, locked location.

Unless a longer retention period is required or permitted by law, we will only hold your data on our on systems for the period necessary to fulfil the purposes outlined within this privacy policy or until you request that the data be deleted.

For further advice on how to stay safe online please visit <u>Cyber Aware</u>, <u>Get Safe</u> <u>Online</u> or the <u>National Cyber Security Centre</u>.

Your data protection rights:

Under data protection law, you have rights including:

- Your right of access You have the right to ask us for copies of your personal information.
- Your right to rectification You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Your right to object to processing You have the right to object to the processing of your personal information in certain circumstances.
- Your right to data portability You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at <u>andrea@brillianthorizons.co.uk</u> or 07754 893864 if you wish to make a request.

Further information about your rights can be obtained from the Information Commissioner's Office. You also have the right to lodge a complaint with the Information Commissioner's Office (ICO):

The ICO Helpline number: 0303 123 1113

ICO website: <u>https://www.ico.org.uk</u>

Cookies:

A "cookie" is a small piece of information that a website assigns to your device while you are viewing a website. Cookies are helpful and can be used for various purposes. These purposes include allowing you to navigate between pages efficiently, enable automatic activation of certain features, remembering your preferences and making the interaction between you and our services quicker and easier.

Cookies are also used to help compile statistical data on your use of our services. You can block or erase cookies from your computer if you want to (see your browser's help screen or manual to do this), but if you chose to do so you will not be able to access most parts of our website which are reliant on the use of cookies to operate correctly and it will not work if you set your browser not to accept cookies.

The Brilliant Horizons Lancashire website uses the following types of cookies:

Session cookies - which are stored only temporary during a browsing session to allow normal use of the system and are deleted from your device when the browser is closed.

Persistent cookies – which are read only be the website, saved on your computer for a fixed period and are not deleted when the browser is closed. Such cookies are used when we need to know who you are for a repeat visit, for example to allow us to store your preferences for the next sign-in.

Third party cookies - which are set by other online services who run content on the page you are viewing, for example by third party analytics companies who monitor and analyse our web access.