

DATA PRIVACY POLICY



1. VALUES

Thank you for trusting us with some information about you. We take that trust seriously and we want you to know how we use your information and why.

If you have any questions about how we use your data, or comments about this Policy, please do contact us. The phone number and email address to use is set out in section 2 below.

We keep this Policy under regular review, and this page may be updated from time to time. Please come back here to check the latest version. This Policy was last updated on the date given in the final box in the table in section 2.

2. WHO ARE WE?

Name: Charlotte Dover

Trading Name: Charlotte Dover Coaching

Email address for official notices: charlotte@charlottedover.com

Data Retention Period(s): Prospects - 3 years; Customers – 7 years; Suppliers, Associates & Affiliates – 7 years

Cookie policy: www.charlottedover.com/cookie-policy

Date this Policy last updated: 29/08/2023

3. WORDS WITH SPECIFIC MEANINGS

In this Policy, there are words and phrases that have a specific meaning or that we are using in a special way. They are:

“personal data”

any information about an identifiable living human being.

“process”

we “process” your personal data when we do anything with it, which might include collecting, recording, organising, storing, adapting, altering, retrieving, using, combining, disclosing, or deleting it.

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“special category data”

personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, sex life or sexual orientation, health, genetic or biometric data.

4. WHAT THIS POLICY DESCRIBES

This policy describes how we will collect and use personal data about you. We process information about:

“Prospects”

potential customers or referrers.

“Customers”

who have bought goods or services from us.

“Suppliers” or “Associates”

suppliers or potential suppliers of goods or services to us.

“Affiliates”

those who have signed up to our affiliate scheme (if we have one).

5. WHAT INFORMATION DO WE PROCESS, AND WHY?

We only collect data that is adequate, relevant and limited to what is necessary in relation to the nature of your relationship with us.

a) *Prospect*

Most of the information we process comes from you. We process it so we can reply to you, and when you contact us again, we know what you asked before, what you were sent, and what you told us.

Typically, we are collecting name, contact details, how we came across you, and background information that’s been provided or published by you on social media or that’s freely accessible on the internet, on why you might be interested in our products or services or a relevant contact for our business.

If you sign up to a newsletter/email list, you will be sent what you asked for. We normally operate ‘double opt-in’ lists and you will need to reconfirm your subscription before anything is sent. You can unsubscribe at any time by clicking the unsubscribe button on any email. You are not automatically subscribed to any other lists but may be invited to join an appropriate one.

Charlotte Dover Coaching
charlotte@charlottedover.com
Charlbury, Chipping Norton
Oxfordshire

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If we email you individually using our own email system or respond to an email you've sent to us at any of our business email addresses, a copy of that email will also be stored.

If you make an enquiry via our website, we will keep details of that enquiry and our response for the as long as is stated in our data retention period in section 2.

We do not routinely keep special category data. To the extent we hold this, it was supplied or made publicly available by you.

b) *Client*

Once you buy/order/book any of our products or services, we will collect information from you at the point of sale. This will include the information we collect from Prospects (above). We collect your email address, phone number and postal address so we can provide what we have contracted to, invoice you and keep proper records of our business relationship.

We process your data to support the delivery of the goods/services you have bought. We keep records of the goods/services provided to you, and information you give us, so we can support you when needed and advise you of any additional services you may need.

We do not receive or store your credit card details. Credit card payments are handled by an external secure processor in accordance with their data security policies (see section 2). We receive limited information from our processor for us to tie up your payment with your invoice.

If you pay us by BACS or direct transfer, we know only what the bank tells us, which is usually the name of the person who paid us and how much and the reference number.

We do not routinely keep credit scores nor use credit reference agencies.

When we are processing data about you on your behalf with a 3rd party (e.g. associate, client or supplier), we are operating under the banner of their data privacy policy. We will refer any enquiry from you to them, as they are the 'data controller' responsible for dealing with your query.

c) *Supplier and Associates*

We collect information on potential and actual suppliers and associates. This is mostly provided by you, but we do add to it the same kind of data we use for Prospects (see above).

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If you become a supplier or associate, we keep a copy of the contract between us and your bank details so we can pay you. We also keep a record of invoices/payments for accounting purposes.

We keep a record of the work you undertook for us/our clients along with any comments, reviews or suggestions about that work, including complaints (if any) and their resolution.

This information is all needed to manage our customer relationships and our supply chain.

d) *Affiliate*

If we set up an affiliate scheme, affiliate data will be held in accordance with this policy. We will ask you for information when you apply and that will be kept for administering the affiliate scheme.

6. NEWSLETTERS AND AUTOMATED EMAILS

We monitor who opens what in our newsletter lists, and pre-set sequences of information we send you. We do this, so we can see if content is popular and generate more of it, or if it is not read.

There may be sub-routines that trigger if you click on links or articles. These are designed to offer you more information about things you are interested in. You can unsubscribe from these sequences at any time.

Existing customers may receive emails about specific offers relating to things you have already purchased. You can unsubscribe from these at any time.

From time to time, we contact individual email newsletter subscribers, but it is extremely rare. This would normally be if something odd were going on and we wanted to check you could see and use the content or find out what was causing a problem.

7. DATA SHARING – 3RD PARTIES

We do not sell or exchange your personal data with organisations who may want to sell you something or use your data for research or other purposes.

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a) *Platforms*

We keep a list of the software platforms we use to run our business. If you would like a list of all the platforms we use, please email us at the email address provided in section 2.

b) *People*

We have an outsourced support team for our own business which may include Virtual Assistants, Web Designers, IT support, Sales and Marketing, Accounting and more. They have limited access to your data, where the service they provide to us means they need it.

For example, if our IT support wants to check the functionality of a laptop or back up, they may need temporary access to information that may include something about you.

For example, if we invoice you, our Accountant needs to process the information in the invoice. Your information/advice is held in the strictest confidence. Our team are all contracted to strict confidentiality clauses.

c) *Recorded Sessions*

If we feel that any coaching sessions or discussions with you should be recorded in order that we can make the content available to you to refer back to we will ask for your consent. If given, you may withdraw this consent at any time.

d) *Marketing*

If we wish to use any information about your journey and successes on our website, we will ask for your consent. If given, you may withdraw this consent at any time.

8. WHERE IS YOUR DATA LOCATED?

Like most small businesses, we do not have any tailor-made software – we use mainstream packages for everything from our customer records, to email to accounting.

This means that some of your data may be held in the EEA, and some may be held in services in the USA (with suitable data privacy shields) or elsewhere. We have picked mainstream suppliers with appropriate security standards

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9. RETENTION PERIODS

Your information will be kept for the length of time as set out in the retention period above (section 2). Customer information will be kept for 7 years for HMRC and insurance purposes. Information is kept on prospective customers for 3 years so that the sales enquiry system is effective. Information on suppliers, associates and affiliates will be kept for 7 years in the event that any subjects associated with the business need to be identified due to any retrospective queries.

If subscribed to a newsletter or updates list, you will remain on the list(s), it is your responsibility to unsubscribe if you so wish.

The business shall regularly, not less than every 6 months, review the data that it holds and will remove any data that is deemed as no longer relevant. Removal shall be made as soon as practically reasonable.

10. YOUR RIGHTS

You have the right to know what information we are collecting on you, and to amend it if it is inaccurate. If you feel for some reason, we have information we should not be keeping, or it is out of date or otherwise wrong, please let us know and we will take appropriate action.

Most of the information we hold is not based on your individual consent but is based on our needing the information to run our business and provide our products and services.

If you want to know what information we have about you (if any) email us at the email address set out above and give us your name, email address(es) and we will happily do a search and let you know what information we hold on you and how we are using it/have used it.

You have a “right to be forgotten” - but that does have some legal limits to it. If you want us to remove information about you, let us know. If you have been a customer, we may not be able to remove all data as we will have to ensure that we can continue to comply with legal, accounting, taxation and our insurer’s requirements.

11. CONFIDENTIALITY

Your information will, under no circumstance, be sold or otherwise be made available to any Third Parties except where it is completely necessary and unavoidable to do so.

Whenever possible, you will be made aware of the necessity to share your personal data with a third party prior to this occurring.

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Before sharing personal information with any Third Party, the business will take all relevant precautions to confirm that the specific Third Party is compliant with GDPR and is confirmed in a written contract.

The business agrees to not disclose any personal information to any Third Party however this restriction does not apply to the following:

- any use or disclosure authorised by you or required by law.
- any use or disclosure which the business considers necessary or advisable in order to prevent illegal acts or harm to you or to others; or
- any information which is already in, or comes into, the public domain otherwise than through the businesses unauthorised disclosure.

12. NOTEKEEPING

As we are a small business, the software we use is one of a mainstream package. This means some data is stored in services in the EEA and some in the USA. All packages have suitable data privacy shields, protection and appropriate security measures.

Unless completely necessary, only the business will have access to personal and session data. The business will not knowingly give data to any Third Parties without good reason.

In line with our retention policy, customer data is kept for 7 years for HMRC and insurance purposes. The data kept consists of client contact information, how the client was found, relevant background information, any information that is freely accessible through social media or the internet from the client that may confirm why the client is interested in certain products or services or is a relevant contact for the business. Similarly, records of the goods and services provided to you are also kept so the business can support you in the future with any additional services that you may require.

It is important to note that the business does not store or receive credit card details. Credit card payments are handled by an external secure provider, they give limited information to the business regarding your payment. The business does not keep credit scores or check credit reference agencies.

Any data processed about you, completed on your behalf with a Third Party, is completed under their data privacy policy. If you wish to inquire about this, the business will pass your enquiry onto them, as they are the 'data controller' and hold responsibility for dealing with this enquiry.

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13. COMPLAINTS

If you have a complaint about the way we are handling your information or how we have responded to a request for information or removal, you can take this up in the first instance by emailing us at the email address set out above.

If we can't sort it out, the relevant supervisory authority for us is the Information Commissioner for the UK. You can contact them [here](#) or by calling 0303 123 1113.

14. COOKIES

For information about cookies and how we use them, please see our cookie policy, linked in section 2.