



Privacy Statement

Ruth Edwards Global Ltd is committed to safeguarding the privacy of all our clients. This Privacy Policy outlines how we use the personal information we collect from you, how we process it, your rights in relation to your personal information, and how to contact us or a supervising authority should you need to.

Who we are

We are Ruth Edwards Global Ltd. registered in England and Wales with company Number 15712992.

Trading name: Ruth Edwards – The Somatic Healing Coach.

Our registered address is 24 Sutton Bridge, Shrewsbury, Shropshire, SY3 7RT.

We are registered as a Data Controller with the Information Commissioner's Office (ICO) under reference ZB692474.

How to contact us

Email: ruth@thesomatichealingcoach.com

You can also write to us at our registered address:

24 Sutton Bridge, Shrewsbury, Shropshire, SY3 7RT.

Lawful basis

We operate our data protection and privacy policies and processes according to the UK's Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). We may act as a Data Controller or a Data Processor depending on the nature of services that we are providing to you.

Our primary lawful basis for processing your information is our mutual intent to create and fulfil a contract relating to the provision of coaching services.

Where you have made an enquiry with us without creating a contract, we will apply a legitimate interest basis to continue to provide you with information relevant to your inquiry. There is a reasonable period following your enquiry during which there is relevant contact and marketing activity.

Where we process your information solely for direct marketing outside of the reasonable period we will ask for your consent.

There may be circumstances where we have a legal obligation to collect and process your information e.g., detecting, preventing, or investigating crime or fraud including working with law enforcement agencies or other governmental departments or services.

Our privacy framework

As part of our commitment to ensure your personal information is protected and processed lawfully, we adopt the following privacy principles:

- We will only request and store the personal information we require to provide you with our products and services, including those you may be interested in, or where we have a legal obligation
- We will only request and store special category personal information, including health and financial information when you request a related service or where we have a legal obligation
- We will only share information with third parties as set out within this policy
- We will use personal information provided to us in accordance with this
- privacy policy

What Information do we collect?

We may collect and store the following types of personal data:

- Information about the use of our websites (including your IP address, geographical location, browser type, referral source, length of visit and number of page views).
- Information that you provide to us for the purpose of engaging our products and services and when requesting contact from us, including name, email address, date of birth, address, telephone number, and work status.
- Information required to deliver our support services, which may include psychometric testing results, your personal and professional interests.
- Special category information required to provide requested services including finance products, health related information allowing us to facilitate special considerations and facilitate our equal opportunities policy, and conviction information where required for safeguarding or by law.
- Your marketing preferences.
- If you choose to take part in our optional feedback surveys, your gender, age,
- ethnicity, location, household income bracket, employment status as well as your answers regarding your opinion of, and use of, our products and services.
- Any other information that you choose to send to us.

How we use personal information

We will use personal information to:

- Contact you regarding your enquiry.
- Provide you with our products and services, including passing necessary information to third parties who form part of the products or services. We may not be able to provide products or services if you do not disclose the required personal information.
- Provide you information relevant to your enquiry
- Given the lawful basis detailed above: provide marketing communications, relating to our business, which are relevant to the product and service engaged by yourself. This may be by post, email, or similar technology.
- Provide and service financial products, including but not limited to, application for credit, account maintenance, notification of changes to accounts, debt collection, and legally or regulatory required communications.
- Administer our website.

- Provide third parties with statistical information about our users – this information will never be provided in a format which can be used to identify any individual.
- Analyse your information to identify trends and tailor our communications and services, including preventing you from receiving unwanted material.
- Aggregated or meta data may be used to identify trends and for gap analysis. In these instances, the data will be anonymised and not attributable to an individual.

Information Retention

We will not keep personal information for longer than is necessary. However, the length of time information is retained will depend on the type of information and the contractual relationship we have in place with you.

As standard we will retain information:

- Enquiries – up to 7 years.
- Customers – up to 7 years from our last interaction with you, which includes you logging into one of our systems.

Our record retention policy is regularly reviewed and updated to ensure we anonymise or delete information that is no longer required.

Please see ‘Your rights’ below to understand your right to erasure (right to be forgotten).

Third parties we work with

Personal information will be shared with third parties where necessary to:

- Fulfil our contract for product and services
- Where you have opted in to receive marketing material from our third parties
- Broker and service financial agreements
- Where legally required

We employ a robust due diligence process when choosing to work with a third-party. This includes ensuring they have the same high standards in processing your information as we do.

Should you require details of any of our third parties and their privacy policies, these can be requested by contacting using the contact information provided above – “How to contact us”.

Additional disclosures

We may disclose information about our customers to any of our employees, officers, agents, suppliers, or subcontractors insofar as reasonably necessary for the purposes set out in this privacy policy.

In addition, we may disclose information in the following circumstances:

- When we are required to do so by law
- In connection with legal proceedings or prospective legal proceedings
- To establish, exercise or defend our legal rights (Including providing information to others for the purposes of fraud prevention, anti-money laundering and reducing credit risk)
- For the purposes of litigation
- To provide regulatory bodies with reports if a breach in regulation occurs

(customers will also receive notification of the details being provided prior to submission if there is any identifying data included within the report).

- In the event that we sell any business or assets, we may disclose personal information held by us to the prospective buyer of said business or assets.

Third party websites

Our website, our product and service, industry and marketing communications may contain links to third parties. We are not responsible for the privacy policies or processes of said third parties.

Information transfer

We store your information in the UK and the EU. We do not directly transfer information outside of the EEA unless it is relevant to our product or service and has been confirmed with yourself.

Payment processing

We maintain full compliance with the Payment Card Industry Data Security Standard (PCI DSS). More information can be found at:

https://www.pcisecuritystandards.org/pci_security/

We use a third-party payment processor Stripe. Please refer to Stripe's privacy policy for further information as to what they do with your personal information.

We do not retain your payment card number. Where payments are made over a number of instalments, we store a 'token' provided by the payment processor. This enables us to collect payments without storing your personal card details.

In the event that an invoice is provided, and payment made by bank transfer, your bank details may be retained by our preferred banking partner (The Co-operative Bank).

When using finance or instalment credit

Instalment credit plans are provided by Ruth Edwards Global Ltd. Your information is processed in line with this policy.

Please refer to their privacy notice and your policy documents to understand how your information is processed in relation to your finance agreement.

If you fall behind or default on your agreed repayments your information may be passed to credit reference agencies and/or debt collection agencies in order to:

- Verify the accuracy of the data you have provided to us.
- Prevent criminal activity, fraud, and money laundering.
- Manage your account.
- Trace and recover debts.
- Ensure any repayment offers provided to you are appropriate to your circumstances.

Feedback surveys and testimonials

If you choose to send us a testimonial review or take part in our feedback surveys, we may display your comments about our service publicly on our website and/or social media platforms. We will not publicly display information sufficient to identify you personally unless you have specifically given us permission to do so.

Cookies

Our website uses a feature of your browser to set a “cookie” on your device. Cookies are small packets of information that a website stores on your computer, they can allow for a better user experience and to make navigation easier; for example, to deliver content specific to your interests.

Some of the cookies we use are strictly necessary for our website to function, and we do not ask for your consent to place these on your computer.

Cookies set by parties other than us are called "third party cookies". Third party cookies enable third party features or functionality to be provided on or through the website, such as advertising, interactive content, and analytics. The third parties that set these cookies can recognise your device when it visits our website and certain other websites.

Most web browser allow you to control cookies. You may modify your browser preferences to accept all cookies, to be notified when a cookie is set, or to reject all cookies. If you choose to reject cookies, certain functions and conveniences of our website may not work properly.

For more information about cookies and how to control them within your browser please see: <https://allaboutcookies.org/>

We use Google Analytics to analyse the use of our websites. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our website is used to create reports about the use of the website. Google will store this information. Google's privacy policy is available at: <http://www.google.com/privacypolicy.html>

Security of personal information

We always take reasonable technical and organisational precautions to prevent the loss, misuse or malicious alteration of any personal information held on our systems. We will store all personal information provided to us on our secure (multi-factor and firewall protected) servers. Where we use third parties to provide information storage and processing services, they are subject to data security checks which include confirmation the provider is a relevant International Organization for Standardization (ISO) Certificate holder and registered with the ICO. As part of our due diligence process, we always review our third party's privacy and data security policies to ensure they meet or exceed our own.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of information transmitted to us in this manner.

Your rights

In relation to the personal information that we hold about you, you may have the following rights:

1. Right To Be Informed – you have the right to ask to see what data we hold about you.

2. Right To Access – to your personal information. If you wish to obtain a copy of the information, we hold about you please contact the relevant individual (contact details below) in writing with the subject 'Subject Access Request'. Generally, the information will be provided within one month, however, please be aware that we will take necessary steps to evidence your identity prior to releasing any personal information for your own security.
3. Right To Rectification – if you believe the information, we hold about you to be incorrect or incomplete you have the right to ensure this is rectified. For further information please contact the individual stated below. This rectification should typically be complete within one month.
4. Right to Erasure – also known as the right to be forgotten. In specific circumstances, you will have the right to have your personal information erased or to prevent processing. We can refuse your request for erasure if we have a legal obligation to continue to hold your personal information, but we will inform you if this is the case.
5. Right to Object – you can ask us to stop contacting you, either by unsubscribing, by writing, calling or emailing us at ruth@thesomatichealingcoach.com

Complaints

Whilst we would like to be given the opportunity to put right any issues you may have initially, you have the right to lodge a complaint with the Information Commissioner's Office (ICO) if you are unhappy with how we have handled your personal information. Further details can be found at: <https://ico.org.uk/make-a-complaint/>

Policy amendments

We may update this policy from time to time. The latest version of this notice will be posted on our website. You should check this page occasionally to ensure you are happy with any changes. If there is a fundamental change in the way we process your information, or to make use of your personal data in a way that we haven't previously identified, we will contact you to provide further information and, if necessary, to ask for your consent.

Policy last reviewed: 23rd September 2024

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