

Cia Edwards/ Achievher Perfection CUSTOMER PRIVACY NOTICE

WHAT IS THE PURPOSE OF THIS DOCUMENT?

Cia Edwards/ Achievher Perfection is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you are using our services, which includes coaching/educational services (the “Services”) and so that you are aware of how and why your personal data will be used, namely for the purposes of the Services, and how long it will usually be retained for. This privacy notice provides you with certain information that must be provided to you, under the General Data Protection Regulation ((EU) 2016/679) (the “GDPR”).

DATA PROTECTION PRINCIPLES

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

THE KIND OF INFORMATION WE HOLD ABOUT YOU

In connection with the Services, we will collect, store, and use the following categories of personal information about you:

- [Information that you have provided in any of the Cia Edwards/ Achievher Perfection sign up or session forms, including name, title, address, telephone number, personal email address, date of birth, gender and employment or education history.]

We may also collect, store and use the following “special categories” of more sensitive personal information:

- [Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.]

HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We collect personal information about the users of our Services from the following sources:

- You
- The following data from third parties is from a publicly accessible source ie. Facebook, Instagram, Twitter, Leadpages and Convert Kit

HOW WE WILL USE INFORMATION ABOUT YOU

We will use the personal information we collect about you to:

- [Generate User Specific Ads]
- [Comply with legal or regulatory requirements.]

It is in our legitimate interests to [help improve our services].

We also need to process your personal information to [continue to retrieve important information that better improves services].

If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to provide you with the Services, we will not be able to provide you with the full scope of our Services.

HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION

We will use your particularly sensitive personal information in the following ways:

- [We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.]

AUTOMATED DECISION-MAKING

You will not be subject to decisions that will have a significant impact on you, based solely on automated decision-making.

DATA SHARING

Why might we share your personal information with third parties?

We may share personal data we hold with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We may also disclose personal data we hold to third parties:

(a) In the event that we sell or buy any business or assets, in which case we may disclose personal data we hold to the prospective seller or buyer of such business or assets.

(b) If we, or substantially all of our assets, are acquired by a third party, in which case personal data we hold will be one of the transferred assets.

If we are under a duty to disclose or share your personal data in order to comply with any legal obligation,

or in order to enforce or apply any contract with you or other agreements; or to protect our rights, property,

or safety of our employees, customers, or others. This includes exchanging information with other

companies and organizations for the purposes of fraud protection and credit risk reduction.

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

TRANSFERRING PERSONAL DATA TO A COUNTRY OUTSIDE THE EEA

We may transfer any personal data we hold to a country outside the European Economic Area ("EEA"),

provided that one of the following conditions applies:

- (a) The country to which the personal data are transferred ensures an adequate level of protection for your rights and freedoms.
- (b) You have given your consent.
- (c) The transfer is necessary for one of the reasons set out in GDPR, including the performance of a contract between us and you, or to protect your vital interests.
- (d) The transfer is legally required on important public interest grounds or for the establishment, exercise or defense of legal claims.
- (e) The transfer is authorized by the relevant data protection authority where we have adduced adequate safeguards with respect to the protection of your privacy, fundamental rights and freedoms, and the exercise of those rights.

Personal data we hold may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. That staff maybe engaged in, among other things, the fulfilment of contracts with you, the processing of payment details and the provision of support services. The method of transfer is [MLB note: please confirm how (if applicable) you currently share personal data relating to the users of the Services, with third parties].

DATA SECURITY

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

DATA RETENTION

How long will you use my information for?

We will retain your personal information for a period of 25 years. We retain your personal information

for that period so that services can still be offered that suit consumer needs. After this period, we will securely destroy your personal information in accordance with [applicable laws and regulations].

RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a “data subject access request”).

This enables you to receive a copy of the personal information we hold about you and to check that

we are lawfully processing it.

- Request correction of the personal information that we hold about you. This enables you to have

any incomplete or inaccurate information we hold about you corrected.

- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the

right to ask us to delete or remove your personal information where you have exercised your right to

object to processing (see below).

- Object to processing of your personal information where we are relying on a legitimate interest (or

those of a third party) and there is something about your particular situation which makes you want

to object to processing on this ground. You also have the right to object where we are processing

your personal information for direct marketing purposes.

- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish

its accuracy or the reason for processing it.

- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the

processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact Cia Edwards(CEO)/ Achievher Perfection in writing.

RIGHT TO WITHDRAW CONSENT

You have the right to withdraw your consent for processing your information at any time. To withdraw your consent, please contact Cia Edwards (CEO). Once we have received notification that you have withdrawn your consent, we will no longer process your information and, subject to our retention policy, we will dispose of your personal data securely.

DATA PRIVACY MANAGER

We have appointed a data privacy manager to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the data privacy manager Cia Edwards.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Cookie consent wording in a pop-up bar for websites

We use cookies to improve your user experience and tailor appropriate consumer ads to the client. Our Website Privacy Policy describes which cookies we use, why we use them, and how you can find more information about them.

Cookie wording for policy

We use cookies and other similar technologies to distinguish you from other users of our website. This helps us to provide you with a better experience when you use the website and allows us to improve it. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer or mobile device. For example, cookies can be used to collect information about your use of the website during your current session and over time (including the webpages you view and the files you download), your operating system and browser type, your internet service provider, your domain name and IP address, the website that you visited before our website, and the link that you use to leave our website. If you are concerned about having cookies on your computer, you can set your browser to refuse all cookies or to indicate when a cookie is being set, allowing you to decide whether to accept it. You can also delete cookies from your computer. However, if you choose to block or delete cookies, certain features of the website may not operate correctly. For more information see www.allaboutcookies.org. [We use [Google Analytics] to help collect and analyze certain information about you (such as age, gender and interests).]