Privacy Policy

At the Integrated Coaching Academy (ICA), we understand that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, and will only collect and use personal data in ways that are described here, and in a manner that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

1. Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

"Account" means an account required to access and/or use certain areas and features of Our Site;

"Cookie" means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 13, below;

"Cookie Law" means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;

"Personal data" means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to us via Our Site or when booking a course with us over the phone. This definition shall, where applicable, incorporate the definitions provided in the Data Protection Act 1998 and EU Regulation 2016/679 - the General Data Protection Regulation ("GDPR"); and

"We/Us/Our" means the Integrated Coaching Academy, a trading arm of Fusion Therapeutic Coaching Ltd.

2. About Us

- 2.1 This website is owned and operated by Fusion Therapeutic Coaching Ltd.
- 2.2 Fusion Therapeutic Coaching Ltd is a limited company registered in England under company number 7825572 . Our Registered Office is: The Old Thatch, The Lane, Tebworth, Beds LU7 9QB

We are registered as a data controller on the Data Protection Register as required by the Data Protection Act 1998, registered number **ZA325800**

2.3 We can be contacted by email at fusionme@btinternet.com by telephone on +44 (0)1525 873039 (Mon–Fri, 10am-3pm, GMT) or by post to The Old Thatch, The Lane, Tebworth, LU7 9QB.

3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

4. Your Rights

- **4.1** As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:
- **4.1.1** The right to be informed about Our collection and use of personal data;
- **4.1.2** The right of access to the personal data We hold about you (see section 5);
- **4.1.3** The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 12);
- **4.1.4** The right to be forgotten i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in section 6 but if you would like Us to delete it sooner, please contact Us using the details in section 12);
- **4.1.5** The right to restrict (i.e. prevent) the processing of your personal data;
- **4.1.6** The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
- 4.1.7 The right to object to Us using your personal data for particular purposes; and
- 4.1.8 Rights with respect to automated decision making and profiling.
- **4.2** If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 12 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office, see: https://ico.org.uk Tel: 0303 123 1113
- **4.3** For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

5. What data do we collect?

Depending upon your use of Our Site and whether you book a training course with us, We may collect some or all of the following personal and non-personal data (please also see section 10 on Our use of Cookies and similar technologies):

- **5.1** name:
- 5.2 business/company name;

- 5.3 job title;
 5.4 profession;
 5.5 contact information such as email addresses and telephone numbers;
 5.6 demographic information such as post code, preferences, and interests;
 5.7 how you heard about us;
 5.8 IP address;
 5.9 web browser type and version;
- 5.11 a list of URLs starting with a referring site, your activity on Our Site, and the site you exit to.

How do we get your consent?

5.10 operating system;

- **5.12** When you provide us with personal information pn our contact form, to complete a transaction online or over the phone, verify your credit card or purchase a product, you consent to our collecting it and using it for that specific reason only. This is processed as part of the 'contractual' lawful basis. If you have filled out a form and agreed to receive emarketing from us, this is also processed as part of the 'consensual' lawful basis. You may also receive emails containing information pertinent to your initial enquiry or course purchases, such as reminders regarding your course expiration dates. This is classified under the 'Legitimate Interests' lawful basis.
- **5.13** You may restrict Our use of Cookies. For more information, see section 10.
- **5.14** You may access certain areas of Our Site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

Access to your data

5.15 You can check the information that we hold about you at any time by emailing us at fusionme@btinternet.com, by telephone on +44 (0)1525 873039 (Mon–Fri, 10am-3pm, GMT) or by post to The Old Thatch, The Lane, Tebworth, LU7 9QB.

Under the GDPR, no fee is payable and We will provide any and all information in response to your request free of charge. If you find any inaccuracies, we will delete or correct them promptly, usually the next working day.

How to withdraw your consent

- **5.16** You may withdraw your consent for us to contact you, for the continued collection, use or disclosure of your information, at any time, by contacting us at fusionme@btinternet.com by telephone on +44 (0)1525 873039 (Mon–Fri, 10am-4pm, GMT) or by post to The Old Thatch, The Lane, Tebworth, LU7 9QB.
- **5.17** To opt out of emarketing, you can unsubscribe at any time by clicking 'Manage my subscriptions' at the bottom of any of our emails to you or by emailing us at fusionme@btinternet.com

6. How we use your data

- **6.1** All personal data is processed and stored securely (for more details on security see sections 7 & 9), for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under GDPR at all times.
- **6.2** Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:
- **6.2.1** Supplying Our services to you (please note that We require your personal data in order to enter into a contract with you and be able to fulfil our services to you), including processing your course payment and sending confirmation and other related information to you;
- 6.2.2 Providing and managing your Account;
- **6.2.3** Providing and managing your access to Our Site;
- **6.2.4** Personalising and tailoring your experience on Our Site;
- **6.2.5** Keeping a record of your training with us in case you decide to proceed with our Diploma Course;
- **6.2.6** Replying to emails from you;
- **6.2.7** Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by clicking the 'Manage Your Preferences' link included in marketing emails or by contacting is directly);
- 6.2.8 Market research;
- **6.2.9** Analysing your use of Our Site and gathering feedback to enable Us to continually improve Our Site and your user experience.
- **6.3** With your permission and/or where permitted by law, We may use your data for marketing purposes which may include contacting you by email, telephone, text message and post with information, news and offers on Our services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.
- **6.4** You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it. We aim to comply with your request within the next working day.

7. How and where we store your data

- **7.1** We only keep your personal data for as long as We need to in order to use it as described above in sections 5 and 6, and/or for as long as We have your permission to keep it.
- **7.2** Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Site.

- 7.3 Steps We take to secure and protect your data include:
- **7.3.1** Computers that hold your personal data are password protected;
- **7.3.2** Data is stored on our secure internal database and a protected Customer Relationship Management (CRM) and email marketing system.
- **7.4** Due to the latter requirement, some or all of your data may be stored outside the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). You are deemed to accept and agree to this by using Our Site and submitting information to Us. If We do store data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR.

8. Do we share your data?

- **8.1** We take your privacy very seriously and **do not** disclose your personal information to any unconnected third parties.
- **8.2** In certain circumstances, however, We may be legally required to share certain data held by Us, which may include your personal data; for example, where We are complying with legal requirements, a court order, or a governmental authority, where We are involved in legal proceedings. Any such disclosure of personal information will be strictly controlled and made fully in accordance with the current UK legislation, in particular the UK Data Protection Act 1998 and the new General Data Protection Act (which comes into effect on 25th May 2018).

Third-party services

- **8.3** We may sometimes contract with third-parties to enable us to supply our services and products to you. The third-party providers used by us will only collect, use and disclose your information to the extent necessary to allow them to perform the services they provide to us.
- **8.3.1** In some cases, the third-parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.
- **8.3.2** Certain third-party service providers, such as payment gateways and other payment transaction processors, have their own privacy policies in respect to the information we are required to provide to them for your purchase-related transactions. For these providers, we recommend that you read their privacy policies so you can understand the manner in which your personal information will be handled by these providers. You can view PayPal's Privacy Policy here.
- **8.3.3** In particular, it is important to note that third-party certain providers may be located in or have facilities that are located a different jurisdiction than either you or Us. So if you elect to proceed with a transaction that involves the services of a third-party service provider, then your information may become subject to the laws of the jurisdiction(s) in which that service provider or its facilities are located. For example, if you are located in Canada and your transaction is processed by a payment gateway located in the United States, then your personal information used in completing that transaction may be subject to disclosure under United States legislation, including the Patriot Act.

- **8.3.4** Please note, once you leave our website or are redirected to a third-party website or application, you are no longer governed by this Privacy Policy.
- **8.3.5** We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such anonymous data with third parties such as prospective affiliates or partners. Data will only be shared and used within the bounds of the law.

External links

When you click on links on our website, some may direct you away from our site (www.fusionmodel.com). We are not responsible for the privacy practices of other sites and encourage you to read their privacy statements too.

9. Secure payments

- **9.1** The ecommerce section of our website is provided by <u>PayPal</u>, who process all of our payments. They provide us with the online e-commerce platform that allows us to sell our products to you. You can view full details in PayPal's privacy policy <u>here</u>.
- **9.2** We never store cardholder data under any circumstances. PayPal is hosted within a PCI DSS compliant infrastructure that's audited by an independent Qualified Security Assessor. PayPal automatically encrypts your confidential information in transit from your computer to PayPal's servers that are heavily guarded both physically and electronically.
- **9.3** We use industry standard SSL-encryption to protect data transmission when purchasing via PayPal's purchasing services through our website, not just on our checkout page. PayPal Fraud Protection Service leverages the SSL (Secure Sockets Layer) protocol that provides online identity and security using an encryption key length of 128 bits, the highest level commercially available.
- **9.4** All security on our website is treated seriously and reviewed on a regular basis. You can check that you are shopping in a secure environment by looking for either a locked padlock or a key icon in the grey bar at the bottom of your screen. Being in 'secure mode' means that all of your details are encrypted to keep them secure.

10. Our use of 'Cookies'

- **10.1** By using the site, you agree to our Cookie Policy. If you wish to restrict cookies being used, please update your browser settings to restrict access.
- **10.2** Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.
- 10.3 All Cookies used by and on Our Site are used in accordance with current Cookie Law.
- **10.4** Our Site uses analytics services provided by <u>Google</u>. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Site is used. This, in turn, enables Us to improve Our Site and the products services offered through it. You do not have to allow Us

to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you.

11. Age of consent

By using this website, you represent that you are at least the age of majority in your state or province of residence, or that you are the age of majority in your state or province of residence, and you have given us your consent to allow any of your minor dependents to use this site.

12. How to contact us

If you would like to: access, correct, amend or delete any personal information we have about you, register a complaint, or simply want more information about this Privacy Policy, please contact us at fusionme@btinternet.com by telephone on +44 (0)1525 873039 (Mon–Fri, 10am-4pm, GMT) or by post to The Old Thatch, The Lane, Tebworth, LU7 9QB.

13. Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy from time to time (for example, if the law changes), so please review it frequently. Changes and clarifications will take effect immediately they are posted on this website and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following. If we make material changes to this policy, we will notify you here that it has been updated, so that you are aware of any changes to what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it. If our site is acquired or merged with another company, your information may be transferred to the new owners so that we may continue to sell products to you.

We recommend that you check this page regularly to keep up-to-date.

Privacy Policy last updated: 26th April 2018.