



BACKGROUND:

Reflections Career Coaching understands that your privacy is important to you and that you care about how your personal data is used. I respect and value the privacy of everyone who visits this website, www.reflectionscareercoaching.co.uk ("My Site") and will only collect and use personal data in ways that are described here, and in a way that is consistent with my obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is requested. By using or accessing my Website or the Services, you agree to the collection, use and disclosure of information in accordance with this Privacy Policy.

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 My Site;
- "Cookie"** means a small text file placed on your computer or device by My Site when you visit certain parts of My Site and/or when you use certain features of My Site. Details of the Cookies used by My Site are set out in Part 13, below; and
- "Cookie Law"** means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003.

2. Information About Me

My Site is owned and operated by Reflections Career Coaching, a Sole Trader. Data Protection Officer:

Name: Emily Maguire

Email address: mail@reflectionstalentagency.co.uk

Telephone number: 07412 833382.

Postal address: Reflections Talent Agency, International House, 142 Cromwell Road, London, SW7 4EF

I am a member of (ICO) 'Information Commissioner's Office' www.ico.org.uk/register

3. What Does This Policy Cover?

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

4. What Is Personal Data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

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5. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which I will always work to uphold:

- a) The right to be informed about my collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact me to find out more or to ask any questions using the details in Part 14.
- b) The right to access the personal data I hold about you. Part 12 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by me is inaccurate or incomplete. Please contact me using the details in Part 14 to find out more.
- d) The right to be forgotten, i.e. the right to ask me to delete or otherwise dispose of any of your personal data that I hold. Please contact me using the details in Part 14 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to me using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if I am relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to me directly, I am using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask me for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. I do not use your personal data in this way.

For more information about my use of your personal data or exercising your rights as outlined above, please contact me using the details provided in Part 14.

Further information about your rights can also be obtained from the Information Commissioner's Office.

If you have any cause for complaint about my use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. I would welcome the opportunity to resolve your concerns myself, however, so please contact me first, using the details in Part 14.

6. What Data Do You Collect and How?

Depending upon your use of My Site, I may collect and hold some or all of the personal data set out in the table below, using the methods also set out in the table. Please also see Part 13 for more information about my use of Cookies and similar technologies. I do not collect any 'special category' or 'sensitive' personal data.

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| Data Collected | How I Collect the Data |
|--|---|
| Identity Data including first name, last name, username, or similar identifier. | When you email, phone or live chat. |
| Contact Data including postal address, invoicing address, D.O.B, emergency contact name and number. email address, phone numbers. | Client registration form. |
| Business Data including business name, job title, profession, first name, last name, business phone number, invoicing address, email address. | When you email, phone or live chat. Client registration form. |
| Profile Data information including first name, Last name, postal address, email address, phone numbers, Password, Username. | When registering for a member account on my website. |
| Transaction Data includes details about payments and other details of our services you have purchased from us. | When purchasing and paying for sessions on my website and receipts from PayPal. Or when sending invoices directly from PayPal. |
| Technical Data including internet protocol (IP) address, you 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. | When you access my website. |
| Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences. | When you agree to be contacted with updates about my services. |
| Usage Data includes information about how you use our Website and Services. | When accessing my website and services. |
| Cookies Data Please refer to section 13 below for information about cookies and how I use them and what kind. | When accessing my website, I use "cookies" to enhance your experience and gather information about visitors and visits to our websites. |
| Third Parties data I may receive information about you through third party portals. | Responding to Bidvine and Bark Career coach agency call out that the client places. |
| Analytics data includes third-party analytics services (such as Google Analytics) to evaluate your use of the Website, compile reports on activity, collect demographic data, analyse performance metrics, and collect and evaluate other information relating to our Website and internet usage. These third parties use cookies and other technologies to help analyse and provide us the data. | When accessing my website. |
| Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website | When accessing my website. |

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feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

7. How Do You Use My Personal Data?

Under the Data Protection Legislation, I must always have a lawful basis for using personal data. The following table describes how I may use your personal data, and my lawful bases for doing so:

| What I Do | What Data I Use | My Lawful Basis |
|---|---|--|
| Registering you on My Site. | Identity Data Contact Data Profile Data Business Data | Consent. Legitimate Interests (verifying applicant is not a malicious user). Performance of Services. |
| Providing and managing your Account. | Identity Data Contact Data Profile Data Business Data Transaction Data | Consent. Legal Obligation. Performance of Services. |
| Providing and managing your access to My Site. | Contact Data Technical Data Login Data Profile Data Business Data | Consent. Legitimate Interests (maintenance of user accounts and comply with user requests). Performance of Services. |
| Personalising and tailoring your experience on My Site. | Contact Data Technical Data Login Data Profile Data Usage Data Business Data | Consent. Legitimate Interests (maintenance of user accounts and comply with user requests). Performance of Services. |
| Administering My Site. | Contact Data Technical Data Login Data Profile Data Usage Data Business Data | Consent. Legitimate Interests (maintenance of user accounts and comply with user requests). Performance of Services. |
| Administering my business. | Contact Data Technical Data Login Data Profile Data Usage Data Business Data | Provide information, and services that you request, or (with your consent) which we think may interest you. |
| Supplying my services to you. | Identity Data | Carry out my services you pay for. |

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|------------------------------------|--|--|
| | Contact Data Business Data | Provide the relevant Services to you |
| Managing payments for my services. | Identity Data Profile Data Contact Data Business Data | Consent. Performance of services. |
| Communicating with you. | Contact Data Profile Data Business Data | Consent. Performance of a Services. |
| Feedback and Testimonials | Identity Data | Consent. Legitimate to show prospective customers a level of trust. |

With your permission and/or where permitted by law, I may also use your personal data for marketing purposes, which may include contacting you by email with information, news, and offers on my services. You will not be sent any unlawful marketing or spam. I will always work to fully protect your rights and comply with my obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. I will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

Third Parties (including PayPal) whose content appears on My Site may use third-party Cookies, as detailed below in Part 13. Please refer to Part 13 for more information on controlling cookies. Please note that I do not control the activities of such third parties, nor the data that they collect and use themselves, and I advise you to check the privacy policies of any such third parties.

I will only use your personal data for the purpose(s) for which it was originally collected unless I reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If I do use your personal data in this way and you wish me to explain how the new purpose is compatible with the original, please contact me using the details in Part 14.

If I need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, I will inform you and explain the legal basis which allows me to do so.

In some circumstances, where permitted or required by law, I may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

8. How Long Will You Keep My Personal Data?

I will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. I will keep personal data for as long as is necessary which is usually the life of our relationship and up to a period of two years after our relationship has ended. I may however be required to retain personal data for a longer period of time to ensure I comply with legislative and regulatory requirements. I review my retention periods for personal information on a regular basis.

9. How and Where Do You Store or Transfer My Personal Data?

I will only store your personal data within the UK. This means that it will be fully protected under the Data Protection Legislation.

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Data is stored in a range of different IT places, including the email system and my Website database. I have implemented security measures such as a firewall to protect any data and maintain a high level of security.

I will store some of your personal data within the European Economic Area (EEA). The EEA consists of all the EU member states, plus Norway, Iceland and Lichtenstein. This means that your personal data will be fully protected under the EU GDPR and/or to equivalent standards by law. Transfer of data between the EEA and the UK are permitted without additional safeguards.

It may be processed outside the EEA to fulfill your order and deal with payment for my services. We will only store or transfer personal data in or to countries that are deemed to provide an adequate level of protection for personal data. For further information about adequacy decisions and adequacy regulations, please refer to the Information Commissioner's Office. Your acceptance of this Privacy Policy shall be your consent permitting me to store or transfer data outside the EEA if it is necessary for me to do so.

Data security is of great importance to me, and to protect your data I have put in place suitable physical, electronic, and managerial procedures to safeguard and secure data collected through my Website. In addition, I limit access to your personal data to third parties who have a business need to know.

I have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where I am legally required to do so. By giving me your personal data, you agree to this arrangement. I will do what I reasonably can to keep your data secure.

Notwithstanding the security measures that I take, it is important to remember that the transmission of data via the internet may not be completely secure and that you are advised to take suitable precautions when transmitting to me data via the internet and you take the risk that any sending of that data turns out to be not secure despite my efforts.

If you create a password upon registration on my Website, you must keep it confidential. Please do not share it.

10. **Do You Share My Personal Data?**

I will not share any of your personal data with any third parties for any purposes, subject to the following exceptions.

In some limited circumstances, I may be legally required to share certain personal data, which might include yours, with if I am involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority or HMRC.

When your personal data is shared with a third party, as described above, I will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, my obligations, and the third party's obligations under the law, as described above in Part 9.

11. **Can I Withhold Information?**

You may access My Site without providing any personal data at all. However, to use all features and functions available on My Site you may be required to submit or allow for the collection of certain data.

You may restrict my use of Cookies. For more information, see Part 13

12. **How Can I Access My Personal Data?**

If you want to know what personal data I have about you, you can ask me for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal

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addresses shown in Part 13 clearly marking your correspondence as a subject access request.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover my administrative costs in responding.

I will respond to your subject access request within one month of receiving it. Normally, I aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date I receive your request. You will be kept fully informed of my progress.

13. How Do You Use Cookies?

My Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by me and are used only by me. I use Cookies to facilitate and improve your experience of My Site and to provide and improve my services. I have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

By using My Site, you may also receive certain third-party Cookies on your computer or device. Third-party Cookies are those placed by websites, services, and/or parties other than me. Third-party Cookies are used on My Site for analytical reasons. For more details, please refer to the table below. These Cookies are not integral to the functioning of My Site and your use and experience of My Site will not be impaired by refusing consent to them.

All Cookies used by and on My Site are used in accordance with current Cookie Law.

I use Cookies and similar technologies in order to distinguish you from other users. By using Cookies, I am able to provide you with a better experience and to improve my Site by better understanding how you use it. Please read this Cookie Policy carefully and ensure that you understand it. Your acceptance of My Cookie Policy is deemed to occur if you continue using my Site. You may, if you wish, deny consent to the placing of Cookies; however certain features of My Site may not function fully or as intended. If you do not agree to My Cookie Policy, please stop using My Site immediately.

Certain features of My Site depend on Cookies to function. Cookie Law deems some of these Cookies to be "strictly necessary". These Cookies are shown in the table below. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser's settings as detailed below, but please be aware that My Site may not work properly if you do so. I have taken great care to ensure that your privacy is not at risk by allowing them.

The following first-party Cookies may be placed on your computer or device:

| Name of Cookie | Purpose | Strictly Necessary |
|----------------|---|--------------------|
| ForceFlashSite | When viewing a mobile site (old mobile under m.domain.com) it will force the server to display the non-mobile version and avoid redirecting to the mobile site. | yes |
| hs | Security | yes |
| smSession | Identifies logged in site members | yes |
| XSRF-TOKEN | Security | yes |
| svSession | Identifies unique visitors and tracks a visitor's sessions on a site | no |

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| | | |
|-------------|------------------------------------|----|
| SSR-caching | Indicates how a site was rendered. | no |
| smSession | Identifies logged in site members | no |

and the following third-party Cookies may be placed on your computer or device:

| Name of Cookie | Provider | Purpose |
|----------------|---------------|----------|
| TS* | Functionality | Security |
| TS01***** | Functionality | Security |

My Site uses analytics services provided by Google. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling me to better understand how My Site is used. This, in turn, enables me to improve My Site and the services offered through it.

The analytics service(s) used by My Site use(s) Cookies to gather the required information. You do not have to allow me to use these Cookies, however whilst my use of them does not pose any risk to your privacy or your safe use of My Site, it does enable me to continually improve My Site, making it a better and more useful experience for you.

The analytics service(s) used by My Site use(s) the following Cookies:

| Name of Cookie | First / Third Party | Provider | Purpose |
|--|---------------------|----------|--|
| _ga, _gat_gtag_UA_116079390_2 _gid | Third | Google | Google Analytics is a web analytics service provided by Google, Inc. used on most of our pages count visitors to count the number of visitors our site receives and to see how users move around our site. |

In addition to the controls that I provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

14. How Do I Contact You?

To contact me about anything to do with your personal data and data protection, including to make a subject access request, please use the following details: for the attention of Emily Maguire.

Email address: mail@reflectionstalentagency.co.uk

Telephone number: 07412 833382



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15. **Changes to this Privacy Policy**

I may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if I change my business in a way that affects personal data protection.

Any changes will be immediately posted on My Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of My Site following the alterations. I recommend that you check this page regularly to keep up to date. This Privacy Policy was last updated on the 8th of March 2022.

16. **Terms and Conditions**

Please also visit our Website Terms of Use policy, establishing the use, disclaimers, and limitations of liability governing the use of our Website.