

# Privacy Policy

## Conduct Change Ltd

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### INTRODUCTION

This privacy policy (“**Policy**”) describes how **Conduct Change Ltd** (“**Company**,” “**we**,” and “**our**”) processes, collects, uses and shares personal data when using this website [nickieyre.co.uk](http://nickieyre.co.uk) (the “**Site**”). Please read the following information carefully to understand our practices regarding your personal data and how we will process data.

#### 1. Purposes of Processing

##### What is personal data?

We collect information about you in a range of forms, including personal data. As used in this Policy, “personal data” is as defined in the General Data Protection Regulation, this includes any information which, either alone or in combination with other information we process about you, identifies you as an individual, including, for example, your name, postal address, email address and telephone number.

##### Why do we need your personal data?

We will only process your personal data in accordance with applicable data protection and privacy laws. We need certain personal data in order to provide you with access to the Site. If you registered with us, you will have been asked to tick to agree to provide this information in order to access our services, purchase our products, or view our content. This consent provides us with the legal basis we require under applicable law to process your data. You maintain the right to withdraw such consent at any time. If you do not agree to our use of your personal data in line with this Policy, please do not use our Site.

#### 2. Collecting Your Personal Data

We receive, collect and store any information you enter on our website or provide us in any other way. We collect information about you in the following ways:

**Information You Give Us.** This includes:

- the personal data you provide when you correspond with us by phone, email or otherwise.
- the personal data you provide when you book on and attend one of our programmes.
- the personal data you provide when you report a problem with our Site or when we provide you with customer support;
- the personal data you provide when you make a purchase thorough our Site; and

Our Site include interfaces that allow you to connect with social networking sites (each a “SNS”). If you connect to a SNS through our Site, you authorise us to access, use and store the information that you agreed the SNS could provide to us based on your settings on that SNS. We will access, use and store that information in accordance with this Policy. You can revoke our access to the information you provide in this way at any time by amending the appropriate settings from within your account settings on the applicable SNS.

**Information Automatically Collected.** We automatically log information about you and your computer or mobile device when you access our Site. For example, when visiting our Site, we log your computer or mobile device operating system name and version, manufacturer and model, browser type, browser language, screen resolution, the website you visited before browsing to our Site, pages you viewed, how long you spent on a page, access times and information about your use of and actions on our Site. We collect this information about you using cookies.

### 3. COOKIES

#### What are cookies?

We may collect information using “cookies.” Cookies are small data files stored on the hard drive of your computer or mobile device by a website. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer or mobile device until you delete them) to provide you with a more personal and interactive experience on our Site.

#### Cookies we use

Our Site is hosted by Wix.com and uses the following types of cookies for the purposes set out below.

There are two types of cookies:

*Session (Transient) cookies:* These cookies are erased when you close your browser, and do not collect information from your computer. They typically store information in the form of a session identification that does not personally identify the user.

*Persistent (Permanent or Stored) cookies:* These cookies are stored on your hard drive until they expire (i.e. they are based on a set expiration date) or until you delete them. These cookies are used to collect identifying information about the user, such as Web surfing behaviour or user preferences for a specific site.

Take a look at the table below to view which cookies Wix places on Wix sites:

Cookie name	Life span	Purpose
svSession	Persistent	Identifies unique visitors and tracks a visitor’s sessions on a site
hs	Session	Security

XSRF-TOKEN	Persistent	Security
smSession	Persistent (Two weeks)	Identifies logged in site members
TSxxxxxxx (where x is replaced with a random series of numbers and letters)	Persistent	Security
TSxxxxxxx_d (where x is replaced with a random series of numbers and letters)	Persistent	Security

### Visitor Analytics

We use Visitor Analytics which is a simple website analytics service which measures the traffic and visitors' general details of the customers' websites. Collecting these statistics, a website can make their visitors' experience better (e.g. which pages they visit and when, where they are approximately located, where does a user land first or if they are coming from a specific referral).

Basically, as a website owner using Visitor Analytics, we are using cookies to collect data about visitors' device type and screen size, approximate location, browser, OS, IPs, page visits, bounce rate, conversions and popular content on the website. All this data is pseudonymized and Visitor Analytics will never use the collected data to identify individual users or to match it with additional information on an individual user. Each visitor has control over the cookies placement.

For further information, please check Visitor Analytics' [Terms Of Use](#), [Cookie Information](#) and [Opt-Out / Do Not Track](#).

We also use Google Analytics:

*Analytics and Performance Cookies:* These cookies are used to collect information about traffic to our Site and how users use our Site. The information gathered does not identify any individual visitor. It includes the number of visitors to our Site, the websites that referred them to our Site, the pages they visited on our Site, what time of day they visited our Site, whether they have visited our Site before, and other similar information. We use this information to help operate our Site more efficiently, to gather broad demographic information and to monitor the level of activity on our Site.

We use Google Analytics for this purpose. Google Analytics uses its own cookies. It is only used to improve how our Site works. You can find out more information about Google Analytics cookies here: <https://developers.google.com/analytics/resources/concepts/gaConceptsCookies>

You can find out more about how Google protects your data here: [www.google.com/analytics/learn/privacy.html](http://www.google.com/analytics/learn/privacy.html).

You can prevent the use of Google Analytics relating to your use of our Site by downloading and installing the browser plugin available via this link: <http://tools.google.com/dlpage/gaoptout?hl=en-GB>

#### **How to control cookies**

You can control and/or delete cookies as you wish by checking your browser settings on each device. In order to do this, follow the instructions provided by your browser (usually located within the “settings,” “help” “tools” or “edit” facility). Many browsers are set to accept cookies until you change your settings. For more details, see [aboutcookies.org](http://aboutcookies.org).

If you do not accept our cookies, you may experience some inconvenience in your use of our Site. For example, we may not be able to recognize your computer or mobile device and you may need to log in every time you visit our Site.

### **4. Using Your Personal Data**

We may use your personal data as follows:

- to operate, maintain, and improve our Site, products, and services;
- to manage your account, including to communicate with you regarding your account, if you have an account on our Site;
- to operate and administer our rewards programme and other promotions you participate in on our Site;
- to respond to your comments and questions and to provide customer service;
- to send information including technical notices, updates, security alerts, and support and administrative messages;
- with your consent, to send you marketing e-mails about upcoming promotions, and other news, including information about products and services offered by us and our affiliates. You may opt-out of receiving such information at any time: such marketing emails tell you how to “opt-out.”
- to process payments you make via our Site;
- as we believe necessary or appropriate (a) to comply with applicable laws; (b) to comply with lawful requests and legal process, including to respond to requests from public and government authorities; (c) to enforce our Policy; and (d) to protect our rights, privacy, safety or property, and/or that of you or others;
- for analysis and study services; and
- as described in the “Sharing of your Personal Data” section below.

### **5. Sharing Your Personal Data**

We do not sell or share your personal data.

### **6. Third Party Sites**

Our business site is hosted on the Wix.com platform. Wix.com provides us with the online platform that allows us to sell our products and services to you. Your data may be stored through Wix.com’s

data storage, databases and the general Wix.com applications. They store your data on secure servers behind a firewall.

All direct payment gateways offered by Wix.com and used by our company adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of credit card information by our store and its service providers.

Our Site may contain links to third party websites and features. This Policy does not cover the privacy practices of such third parties. These third parties have their own privacy policies and we do not accept any responsibility or liability for their websites, features or policies. Please read their privacy policies before you submit any data to them.

## 7. International Data Transfer

Your information, including personal data that we collect from you, may be transferred to, stored at and processed by us outside the country in which you reside, where data protection and privacy regulations may not offer the same level of protection as in other parts of the world. By accepting this Policy, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Policy.

## 8. Security

We seek to use reasonable organizational, technical and administrative measures to protect personal data within our organization. Unfortunately, no transmission or storage system can be guaranteed to be completely secure, and transmission of information via the internet is not completely secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us.

## 9. Retention

We will only retain your personal data for the purpose of letting you know about the services we offer. You may unsubscribe from our communications at any time.

## 10. Our Policy on Children

Our Site is/are not directed to children under 16. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should contact us. We will delete such information from our files as soon as reasonably practicable.

## 11. Your Rights

- **Opt-out.** You may contact us anytime to opt-out of: (i) direct marketing communications; (ii) automated decision-making and/or profiling; (iii) our collection of sensitive personal data; (iv) any new processing of your personal data that we may carry out beyond the original

purpose; or (v) the transfer of your personal data outside the EEA. Please note that your use of some of the Site may be ineffective upon opt-out.

- You may access the information we hold about you at any time via your profile/account or by contacting us directly.
- You can also contact us to update or correct any inaccuracies in your personal data.
- Your personal data is portable – i.e. you to have the flexibility to move your data to other service providers as you wish.
- **Erase and forget.** In certain situations, for example when the information we hold about you is no longer relevant or is incorrect, you can request that we erase your data.
- If you wish to exercise any of these rights, please contact us. In your request, please make clear: (i) **what** personal data is concerned; and (ii) **which of the above rights** you would like to enforce. For your protection, we may only implement requests with respect to the personal data associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable and in any event, within one month of your request. Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting such change or deletion.

## 12. Complaints

We are committed to resolve any complaints about our collection or use of your personal data. If you would like to make a complaint regarding this Policy or our practices in relation to your personal data, please contact us at: [nicki@conductchange.co.uk](mailto:nicki@conductchange.co.uk). We will reply to your complaint as soon as we can and in any event, within 30 days. We hope to resolve any complaint brought to our attention, however if you feel that your complaint has not been adequately resolved, you reserve the right to contact your local data protection supervisory authority

## 13. Contact Information

We welcome your comments or questions about this Policy. You may contact us in writing at [nicki@conductchange.co.uk](mailto:nicki@conductchange.co.uk)

## 14. Updates

We reserve the right to modify this privacy policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website. If we make material changes to this policy, we will notify you here that it has been updated, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it.

I have reviewed the Privacy Policy and I give my consent to the terms laid out.

Accept It