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# PRIVACY POLICY

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The London Fertility Coach understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, <http://www.thelondonfertilitycoach.co.uk/> (“**Our Site**”) and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it.

## 1. **Information About Us**

Our Site is owned and operated by The London Fertility Coach; a limited business registered in England under company number <<insert company number>>. Registered address: <<insert address>>.

Representative: Fiona Skinner. Email address: [info@thelondonfertilitycoach.co.uk](mailto:info@thelondonfertilitycoach.co.uk).

## 2. **What Does This Policy Cover?**

This Privacy Policy applies only to your use of Our Site. 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.

## 3. **What Is Personal Data?**

3.1 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’.

3.2 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.

### 3.3 **How we use your information and the law?**

We collect basic Personal Data about you which does not include any special types of information or location-based information. This does however include name, address, contact details such as email and mobile number etc as set out below. We will also collect sensitive confidential data known as “Special Categories of Personal Data”, in the form of information about your health, ethnicity, and sex during the coaching and advise services we provide to you. From time to time this includes but is not limited to

your medical history including details of appointments and contact with you, medication, emergency appointments and admissions, clinical notes, treatments, results of investigations, supportive care arrangements, social care status, race, ethnic origin, genetics and sexual orientation.

#### 4. **What Are Your Rights?**

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

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 13.
- b) The right to access the personal data we 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 us is inaccurate or incomplete. Please contact us using the details in Part 13 to find out more.
- d) The right to be forgotten, i.e., the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 13 to find out more.
- e) The right to restrict (i.e., prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are 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 us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us 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. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 13.

- It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data. Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.
- If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 13.

## 5. What Data Do You Collect and How?

5.1 Depending upon your use of Our Site or our services, we 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.

5.2 We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your 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 you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback, and survey responses.
- **Usage Data** includes information about how you use our website, products, and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

5.3 We also collect, use, and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **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 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.

5.4 We also collect Information about medical or health conditions, Information about medical or health conditions of your family,

#### 5.5 **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

5.6 **How is your personal data collected?** We use different methods to collect data from and about you including through:

5.6.1 **Direct interactions.** You may give us your Identity and Contact information by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you: apply for our products or services; create an account on our website; subscribe to our service or publications; request marketing to be sent to you; enter a competition, promotion or survey; or give us feedback or contact us.

5.6.2 **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. From time to time, We collect this personal data by using cookies, server logs and other similar technologies.

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

#### 5.7 **How Do You Use My Personal Data?**

5.8 Under the Data Protection Legislation, we must always have a lawful basis for using personal data. We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation

The following table describes how we will use your personal data, and our lawful bases for doing so:

| <b>Purpose/Activity</b>  | <b>Type of data</b>  | <b>Lawful basis for processing including basis of legitimate interest</b>   |
|--|--|---|
| To register you as a new client  | (a) Identity<br>(b) Contact  | Performance of a contract with you  |
| To process and deliver your order including:<br>a) Manage payments, fees and charges<br>b) Collect and recover money owed to us  | (a) Identity<br>(b) Contact<br>(c) Financial<br>(d) Transaction<br>(e) Marketing and Communications          | a) Performance of a contract with you<br>b) Necessary for our legitimate interests (to recover debts due to us)   |
| To manage our relationship with you which will include:<br>a) Notifying you about changes to our terms or privacy policy<br>b) Asking you to leave a review or take a survey | (a) Identity<br>(b) Contact<br>(c) Profile<br>(d) Marketing and Communications                               | a) Performance of a contract with you<br>b) Necessary to comply with a legal obligation<br>c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)   |
| To enable you to partake in a competition or complete a survey   | (a) Identity<br>(b) Contact<br>(c) Profile<br>(d) Usage<br>(e) Marketing and Communications                  | a) Performance of a contract with you<br>b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)  |
| To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)      | (a) Identity<br>(b) Contact<br>(c) Technical   | a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)<br>b) Necessary to comply with a legal obligation |
| To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you                                 | (a) Identity<br>(b) Contact<br>(c) Profile<br>(d) Usage<br>(e) Marketing and Communications<br>(f) Technical | Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)   |
| To use data analytics to improve our website, products/services,   | (a) Technical  | Necessary for our legitimate interests (to define types of customers for our products   |

|   |  |   |
|---|--|---|
| marketing, customer relationships and experiences   | (b) Usage  | and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) |
| To make suggestions and recommendations to you about goods or services that may be of interest to you | (a) Identity<br>(b) Contact<br>(c) Technical<br>(d) Usage<br>(e) Profile<br>(f) Marketing and Communications | Necessary for our legitimate interests (to develop our products/services and grow our business)                       |

5.9 To provide the products and services to you and to make any subsequent fertility recommendations, we process Special Category data for the purposes of:

- (a) Performance of a contract with you (to make any fertility related recommendations solely based on Fiona Skinners personal experience and should not be taken as medical advice); and
- (b) Necessary for our legitimate interests (to keep our records updated).

You are free at any time to change your mind and withdraw your consent. We will advise you if the consequence of doing so is that we cannot continue to provide further coaching services to you.

## 6. Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

### 6.1 Opting out

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase or experience or other transactions.

### 6.2 Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **7. How Long Will You Keep My Personal Data?**

- 7.1 By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.
- 7.2 In some circumstances you can ask us to delete your data: see your legal rights in Part 4 above for further information.
- 7.3 In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## **8. How and Where Do You Store or Transfer My Personal Data?**

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

## **9. Do You Share My Personal Data?**

We will not share any of your personal data with any third parties for any purposes, subject to the following exception. In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## **10. How Can I Control My Personal Data?**

- i. In addition to your rights under the Data Protection Legislation, set out in Part 4, when you submit personal data via Our Site, you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails, at the point of providing your details and by managing your Account).
- ii. You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

## 11. Can I Withhold Information?

You may access certain areas of Our Site without providing any personal 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.

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

- 12.1 If you want to know what personal data, we have about you, you can ask us 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”.
- 12.2 **No fee usually required.** You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.
- 12.3 **What we may need from you.** We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
- 12.3 **Time limit to respond.** We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 13. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please email Fiona Skinner at: [info@thelondonfertilitycoach.co.uk](mailto:info@thelondonfertilitycoach.co.uk)

## 14. Changes to this Privacy Policy

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection. Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up to date.

This Privacy Policy was last updated in April 2021.