



**Rosie Withey**  
Emotional Wellbeing Coaching

## **Privacy and Data Policy**

Your privacy and permission are important to me. This privacy policy between you and Rosie Withey sets out the basis on which I will process any personal data I collect from you, or which you provide to me.

This policy adheres to the Data Protection Act 1998 and GDPR (EU Directive) 2018. For the purposes of this policy Rosie Withey is the data controller.

### **DEFINITIONS**

#### **YOU/USER**

For the purposes of this privacy policy, you/user is defined as any third party that accesses the website and is not either (i) employed by Rosie Withey and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to Rosie Withey and accessing the website in connection with the provision of such services.

Rosie Withey: Little Bartletts, Clutton Hill, Clutton, Bristol BS39 5QQ

### **COLLECTION OF PERSONAL INFORMATION**

Rosie Withey may collect and use the following kinds of personal information:

- Information about how you use this website
- Information that you provide to us for the purpose of registering via this website
- Any other information that you send to Rosie Withey such as via a website form including:
  - Name
  - Address
  - Company
  - Email Address
  - Telephone number

### **USE OF PERSONAL INFORMATION**

By using this site, you consent to us processing and collecting the aforementioned data, on the terms and for the reasons which are explained below.

- Ensure that content from our site is presented in the most effective manner for you and for your computer.

Provide you with information, products or services that you request from us where you have consented to be contacted for such purposes

- Carry out our obligations arising from any contracts entered into between you and us.
- Allow you to participate in interactive features of our service, when you choose to do so.
- Send you our newsletters from time to time that you have positively consented to receive.
- Send you marketing communications that you have positively consented to receive.

## SECURING YOUR DATA

Rosie Withey will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

Rosie Withey will store all the personal information you provide securely and in accordance with UK data protection laws, but please be aware that any data which you send to our site is sent at your own risk.

Any payment transactions made to Rosie Withey will be encrypted using SSL technology

Rosie Withey uses Mailchimp to store personal data which has self-certified to both the EU-U.S Privacy Shield and Swiss-U.S. Privacy Shield regimes, and lawfully transfers EU/EEA personal data to the U.S. pursuant to our Privacy Shield Certification. They also complete a SOC II Type 2 examination on an annual basis for the Trust Principal Criteria of Security, Processing Integrity, Confidentiality, and Availability. For more information on Mailchimp's adherence to GDPR, click [here](#).

The data that we collect from you will be transferred to, processed and/ or stored on secure servers located in the U.S. on the cloud based accounting software [Xero](#). Servers have SSL Certificates issued by leading certificate authorities Entrust & GTE Cybertrust, with all data transferred between Horses as Teachers and the Service encrypted. Xero's servers are located within enterprise-grade hosting facilities that employ robust physical security controls to prevent physical access to the servers they house, including: 24/7/365 monitoring and surveillance, on-site security staff and regular ongoing security audits. For more information on Xero's adherence to GDPR click [here](#).

## DATA BREACH

In the unlikely event that our systems are breached, we will inform the ICO immediately and adhere to their guidelines.

## DISCLOSURE OF YOUR INFORMATION

We will never pass on your details to third parties without receiving your positive consent to do so.

We may disclose your personal information to any of our group companies (which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 736 of the UK Companies Act 1985) and also to third parties in the following circumstances:

- To any prospective seller or buyer of all (or part of) our business or assets
- If we are required to do so by law, any applicable regulation or to protect the rights, property, or safety of ourselves or others. This may include disclosing to other companies and organisations in connection with fraud protection and credit risk reduction.

## **ACCESS TO YOUR INFORMATION**

Your data will be retained for up to 36 months, within which time Rosie Withey will seek your consent to continue to hold such information.

If you no longer wish to be contacted in relation to information, products or services that you have previously requested from us, please contact us directly by emailing [rosie@rosiewithey.co.uk](mailto:rosie@rosiewithey.co.uk).

You have the right under the Data Protection Act to access the information which we hold about you. You have the right to have your information amended or deleted upon request. If you wish to exercise this right, please send your request to [rosie@rosiewithey.co.uk](mailto:rosie@rosiewithey.co.uk).

Following GDPR guidelines Rosie Withey will answer and action all requests within 28 days of receipt.

## **OTHER WEBSITES**

Please note that if you click on, or follow, any links from our site to external websites, our private policy will no longer apply. Please check the privacy policies of any such external site before submitting any personal data, as we cannot accept any responsibility or liability in relation to them.

## **UPDATES TO THIS POLICY**

Any changes made to this privacy policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check this page occasionally to ensure you are familiar with any changes.

## **GENERAL**

This agreement will be governed by and interpreted according to the law of England and Wales. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the English and Welsh courts.

## **CONTACT US**

If you have any questions about this privacy policy or how we treat your personal information, please contact us:

By email: [rosie@rosiewithey.co.uk](mailto:rosie@rosiewithey.co.uk)

By phone: 07775 594294