

# Privacy Policy and data protection information notice

## Privacy Policy and data protection information notice

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**DATE: 24.06.2023**

### 1 Introduction

- 1.1 We are committed to safeguarding the privacy of the clients and contractors we work with; in this notice we explain how we will handle your personal data.
- 1.2 This notice applies where we are acting as a data controller with respect to the clients in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 In this notice, "we", "us" and "our" refer to **Life Coach – Transformation and Empowerment from Inside Out**.

### 2. The personal data that we collect

- 2.1 In this section 2 we have set out the general categories of personal data that we process as stated in point 1.2.
- 2.2 We may process ("**contact data**") Ewa Lawreszuk, Writer/Author, the owner of the visions and ideas, [wildladynow@gmail.com](mailto:wildladynow@gmail.com).
- 2.3 We may process information contained in or relating to any communication we will have on the platform [www.wildladynow.com](http://www.wildladynow.com) that you send to us or that we send to you ("**communication data**"). The communication data may include the communication content and metadata associated with the communication according to signed agreements including any data as needed to sign into membership on the site [www.wildladynow.com](http://www.wildladynow.com), and agreements (during and after the LEADERSHIP/COACHING SERVICES AGREEMENT ACCORDING [www.wildladynow.com](http://www.wildladynow.com) AUTHOR/ARTIST EWA LAWRESH & EXCLUSIVE INTELLECTUAL PROPERTY AGREEMENT FOR COPYRIGHTED ARTWORK / Coaching OF EWA LAWRESH ON [www.wildladynow.com](http://www.wildladynow.com)) – which term is indefinite.
- 1.4 We may process your personal data that is contained in or associated with any deliverables that you produce and provide to us, or that is contained in or associated with any deliverables produced and provided to us by any relevant third party in connection with the work that you perform for us ("**deliverables data**"). The deliverables data may include any vulnerable data in the agreements (during and after the LEADERSHIP/COACHING SERVICES AGREEMENT ACCORDING [www.wildladynow.com](http://www.wildladynow.com) AUTHOR/ARTIST EWA LAWRESH & EXCLUSIVE INTELLECTUAL PROPERTY AGREEMENT FOR COPYRIGHTED ARTWORK / Coaching OF EWA LAWRESH ON [www.wildladynow.com](http://www.wildladynow.com)) – which term is indefinite.
- 2.5 We may process your personal data relating to the services that you provide to us, including data in contracts between us, data concerning the nature of the services, data concerning the time and manner of the performance of the services, and data relating to any expenses claims that you may make ("**services data**"). The service data may in particular include written words and ideas.
- 2.6 We may process data about your use of our valuable ideas and written words ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system and navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system.
- 2.7 We may process all data related to the agreement (during and after the LEADERSHIP/COACHING SERVICES AGREEMENT ACCORDING [www.wildladynow.com](http://www.wildladynow.com) AUTHOR/ARTIST EWA LAWRESH & EXCLUSIVE INTELLECTUAL PROPERTY AGREEMENT FOR COPYRIGHTED ARTWORK / Coaching OF EWA LAWRESH ON [www.wildladynow.com](http://www.wildladynow.com)) – which term is indefinite.
- 2.8 Please do not supply any other person's personal data to us, unless we prompt you to do so.

### 3. Purposes of processing and legal bases

- 3.1 In this section 3, we have set out the purposes for which we may process personal data and the legal bases of the processing.
- 3.2 **Operations** - We may process your personal data for the purposes supplying our own good and/or services, receiving goods and/or services and processing invoices, bills and other payment-related documentation. The legal

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basis for this processing is our legitimate interests, the performance of a contract between you and us in the agreement (during and after the LEADERSHIP/COACHING SERVICES AGREEMENT ACCORDING [www.wildladynow.com](http://www.wildladynow.com) AUTHOR/ARTIST EWA LAWRESH & EXCLUSIVE INTELLECTUAL PROPERTY AGREEMENT FOR COPYRIGHTED ARTWORK / Coaching OF EWA LAWRESH ON [www.wildladynow.com](http://www.wildladynow.com)) – which term is indefinite.

- 3.3 **Relationships and communications** - We may process your contact data and/or communication data for the purposes of communicating with you by email, SMS, post, fax and/or telephone. The legal basis for this processing is our legitimate interests, namely communications with our suppliers, the maintenance of our relationships, enabling the use of supplier services, and the proper administration of our services and business upon the agreement (during and after the LEADERSHIP/COACHING SERVICES AGREEMENT ACCORDING [www.wildladynow.com](http://www.wildladynow.com) AUTHOR/ARTIST EWA LAWRESH & EXCLUSIVE INTELLECTUAL PROPERTY AGREEMENT FOR COPYRIGHTED ARTWORK / Coaching OF EWA LAWRESH ON [www.wildladynow.com](http://www.wildladynow.com)) – which term is indefinite.
- 3.4 **Record keeping** - We may process your personal data for the purposes of creating and maintaining our databases, back-up copies of our databases and our business records generally. The legal basis for this processing is our legitimate interests, namely ensuring that we have access to all the information we need to properly and efficiently run our business in accordance with this notice.
- 3.5 **Security** - We may process your personal data for the purposes of security and the prevention of fraud and other criminal activity. The legal basis of this processing is our legitimate interests, namely the protection of our services and business, and the protection of others.
- 3.6 **Insurance and risk management** - We may process your personal data where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks and/or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 3.7 **Legal claims** - We may process your personal data where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 3.8 **Legal compliance and vital interests** - We may also process your personal data where such processing is necessary for compliance with a legal obligation to which we are subject or in order to protect your vital interests or the vital interests of another natural person.

### **4. Providing your personal data to others**

- 4.1 We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes, and on the legal bases, set out in this notice.
- 4.2 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice.
- 4.3 In addition to the specific disclosures of personal data set out in this section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

### **5. International transfers of your personal data**

- 5.1 In this section 5, we provide information about the circumstances in which your personal data may be transferred to a third country under UK and/or EU data protection law.
- 5.2 We may transfer your personal data from the European Economic Area (EEA) to the UK and process that personal data in the UK for the purposes set out in this notice, and may permit our suppliers and subcontractors to do so, during any period with respect to which the UK is not treated as a third country under EU data protection law or benefits from an adequacy decision under EU data protection law; and we may transfer your personal data from the UK to the EEA and process that personal data in the EEA for the purposes set out in this notice, and may permit our suppliers and subcontractors to do so, during any period with respect to which EEA states are not treated as third countries under UK data protection law or benefit from adequacy regulations under UK data protection law.

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- 5.3 We have an office in UK. The competent data protection authorities have made an adequacy determination with respect to the data protection laws of each of these countries. Transfers to each of these countries will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the competent data protection authorities.
- 5.4 *Ewa Lawresh* is situated in UK. The competent data protection authorities have made an adequacy determination with respect to the data protection laws of UK. Transfers to each of these countries will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the competent data protection authorities, a copy of which you can obtain from us.

### **6. Retaining and deleting personal data**

- 6.1 This section 6 sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 6.3 We will retain your personal data which will be retained for a maximum period of 10 year from the date of signed agreements.
- 6.4 In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the following criteria:
- (a) during and after the LEADERSHIP/COACHING SERVICES AGREEMENT ACCORDING [www.wildladynow.com](http://www.wildladynow.com) AUTHOR/ARTIST EWA LAWRESH & EXCLUSIVE INTELLECTUAL PROPERTY AGREEMENT FOR COPYRIGHTED ARTWORK / Coaching OF EWA LAWRESH ON [www.wildladynow.com](http://www.wildladynow.com)) – which term is indefinite.
- 6.5 Notwithstanding the other provisions of this section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

### **7. Security of personal data**

- 7.1 We will take appropriate technical and organisational precautions to secure your personal data and to prevent the loss, misuse or alteration of your personal data.
- 7.2 We will store your personal data on secure servers, personal computers and mobile devices, and in secure manual record-keeping systems.
- 7.3 The following personal data will be stored by us under locked board and in encrypted forms.
- 7.4 You acknowledge that the transmission of unencrypted data over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

### **8. Amendments**

- 8.1 We will notify you of any changes to this notice which may affect you by post or on email communication.

### **9. Your rights**

- 9.1 In this section 9, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.
- 9.2 Your principal rights under data protection law are:
- (a) **the right to access** - you can ask for copies of your personal data;
- (b) **the right to rectification** - you can ask us to rectify inaccurate personal data and to complete incomplete personal data;
- (c) **the right to erasure** - you can ask us to erase your personal data;

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- (d) **the right to restrict processing** - you can ask us to restrict the processing of your personal data;
  - (e) **the right to object to processing** - you can object to the processing of your personal data;
  - (f) **the right to data portability** - you can ask that we transfer your personal data to another organisation or to you;
  - (g) **the right to complain to a supervisory authority** - you can complain about our processing of your personal data; and
  - (h) **the right to withdraw consent** - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.
- 9.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee. You can access your personal data by writing under address [wildladynow@gmail.com](mailto:wildladynow@gmail.com)
- 9.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.
- 9.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.
- 9.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.
- 9.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
- 9.8 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.
- 9.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- 9.10 To the extent that the legal basis for our processing of your personal data is:
- (a) consent; or
  - (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract,

and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

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- 9.11 If you consider that our processing of your personal data infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. In relation to complaints under EU data protection law, you may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement; in relation to complaints under UK data protection law, you should do so in the UK.
- 9.12 To the extent that the legal basis for our processing of your personal data is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- 9.13 You may exercise any of your rights in relation to your personal data by written notice to us [wildladynow@gmail.com](mailto:wildladynow@gmail.com)

### **10. Our details**

- 10.1 Our full legal name is Ewa Lawreszuk.
- 10.2 We are registered in England under registered office is at 43 Cranley Road, OX38BP, Oxford, UK.
- 10.3 Our principal place of business is at point 10.2.
- 10.4 You can contact us:
- (a) by post, to the postal address given above;
  - (b) by email, to [wildladynow.com](mailto:wildladynow.com)

#### **Data protection information notice:**

Under data protection law, data controllers have obligations to provide to data subjects (i.e. individuals) information about how they process personal data. This data protection information notice is designed to help controllers to meet those obligations with respect to individual subcontractors and freelancers appointed by the controller.

The principal provision in the notice cover: (a) the purposes of processing and the legal bases of processing; (b) disclosures of personal data to third parties and international transfers; (c) data retention policies; and (d) security issues.

Categories of data that are considered include contact information, information in correspondence, information contained in deliverables, information about services provision, transaction information, and system usage information.

This notice has been drafted to take account of the rather specific requirements of the General Data Protection Regulation or GDPR, in both its original EU form and in its post-Brexit UK form.

In many areas, the EU GDPR and the UK GDPR are identical; in other areas, the differences are limited to jurisdictional and governmental references. Also, the text of the UK GDPR is not set out in a single piece of legislation. For these reasons, we have generally referenced the EU GDPR rather than the UK GDPR in the notes to this document, although in some areas both are covered. See the Keeling Schedule for a readable version of the UK GDPR (<https://www.gov.uk/government/publications/data-protection-law-eu-exit>).

*Regulation (EU) 2016/679 (General Data Protection Regulation) - <https://gdpr-info.eu>*