

Last updated 16th September 2024

PRIVACY NOTICE

This Privacy Notice sets out the details of how XPI Youth (“**we**”, “**us**”, “**our**”) as data controller, collects and processes your data through our website located at www.zoewalters.com (“**the Website**”), which runs and operates by XPI Corp.

For this Privacy Notice, personal data means any information that can be used to identify an individual, whether directly or indirectly.

Please read through the content of this Privacy Notice carefully and ensure that you understand it. If you do not understand the content of this Privacy Notice or do not accept or agree with it, you must stop using the Website immediately. By accessing the Website and providing us with your personal data, you warrant that you are over 13 years of age.

If you have any questions about this Privacy Notice or require more information concerning our privacy practices, please contact us at info@xpiyouth.com

What personal data do we process, why do we process it, and how do we collect it

We may process personal data that you provide by subscribing to our email list, requesting information through our contact forms, completing questionnaires, or by any other communication via email, text, FB Messenger, or through our Website or other online platforms and social media channels.

We may also process your personal data through cookies or other tracking software. Please refer to our separate cookie policy for further information.

We may also process data received from third parties such as Google, Facebook, Pinterest, Instagram, YouTube or other analytic, search, advertising, or online

information providers based outside of the USA or Paypal, Stripe or other payment processing providers based outside of the USA.

When we process your personal data, we will comply with the relevant data protection laws and principles such as the General Data Protection Regulation (EU Regulation 2016/679) ("**GDPR**"), which means that your data will be used lawfully, fairly and in a transparent way, kept securely and only for as long as necessary for the purposes we have told you about.

We shall only collect and process your personal data for purposes clearly outlined before you provide us with your data or for a legitimate reason.

Whenever we process your personal data, we do so based on a lawful condition; this will either be because you have given your consent for us to process your data, where we are under a contractual or legal obligation, or where it is in our legitimate interests to do so.

We do not carry out automated decision-making or any type of automated profiling.

The types of personal data which we process will vary depending on your own specific circumstances but typically can include:

- Personal Information: This may include your name, date of birth, email address, phone number, business contact details, correspondence address, and IP address. We shall process this data to communicate with you and keep our records on the lawful grounds of legitimate interest;
- Customer or Client Information: should you purchase goods and/or services from us, we may process information in connection with your purchase and the supply of that purchase and keep appropriate records. Such information may include your Personal Information, billing address, delivery address, credit card or other payment details, and we shall process it on contractual grounds;

- User Information: This may include comments or statements that you may make or post via our Website, online platforms or social media channels, images, documents or videos that you share on or through our Website or any of our pages or other online platforms, and information concerning your use of our Website or other online media such as your browser information, pixel ID, page views, pages visited, number of visits and where appropriate log-in details. We shall process this information to analyse and monitor usage and content of our Website and other platforms and channels to ensure the content is relevant to you, to support our administration and record-keeping requirements, and to maintain the security of our systems on legitimate interest grounds;
- Promotional Information: this may include information you provide in connection with any promotions, marketing or advertising from Zoe Walters or our third parties, such as contributors and affiliates. We shall use this information to provide relevant offers and advertisements, competitions and promotions and other free resources, monitor our promotional activity, keep records and compile analytics on legitimate interest grounds.

We may also process your personal data to deliver or send relevant advertisements to you through our Website and other online platforms and to analyse the success and effectiveness of such adverts for our legitimate interest purposes of promoting and growing our business.

By the Privacy and Electronic Communications Regulations (PECR) we may also send you relevant advertisements or marketing information if you:

1. have ever purchased or enquired about our products or services, and
2. at the time of your purchase or enquiry, you agreed to receive advertising or marketing information from us, and you have not opted out from receiving that information.

Where we contact you through email, we shall ensure that our emails include clear options for you to opt-out from receiving contact from us per the CAN-SPAM act.

Sensitive Data

We do not collect any sensitive data about you. Sensitive data includes your health, race or ethnicity, political opinion, religious or philosophical beliefs, trade union membership, genetics, biometrics, sex life or sexual orientation. We do not process any data relating to criminal offences and convictions.

Disclosure of personal data

We may use any of the following external service providers to support our business and may share your personal data with those third parties:

1. Infusionsoft;
2. Facebook;
3. Google;
4. Paypal;
5. Stripe;
6. Zoom;
7. Whatsapp;
8. ActiveCampaign;
9. MC Widget;
10. LeadPages;
11. YouTube;
12. Wix
13. Kajabi

We understand that these third parties have appropriate technical and security processes to protect your data.

We may also share your personal data as follows:

1. where it is necessary for external service providers whom we have engaged to assist in the provision of services to our clients and customers;
2. where our professional support teams require it;
3. where we are required by a government body or legal obligation to protect our rights;
4. where it is required in connection with the sale or purchase of any business or assets;
5. with any other member or company of our group.

Where we have outsourced a function or activity to an external service provider, we will only disclose personal data that the service provider needs to undertake that function or activity, and we require external service providers to agree to keep your personal data secure by the relevant law.

We agree not to share your personal data with any third party for that third party's marketing purposes unless we have obtained your consent to do so.

Transfer of personal data

XPI Youth is a non-profit business based in the United States of America. We comply with the Internet laws applicable to the USA, including the GDPR. Your data may transit through the software primarily named above, which may reside outside the USA.

We may also transfer your data to a third-party service provider, which requires your data to be transferred outside of the EEA. Where your data is transferred outside of the EEA by our third-party service providers, we understand that they comply with the following standards relating to the security of your personal data - we also observe the specific policies for each of those listed below, who all have their privacy policies.

1. Infusionsoft uses the EU Model Contract, which governs the lawful transfer of data from the EEA to countries outside of the EEA. In respect of any payment or financial information, Infusionsoft also complies with the Payment Card Industry Data Security Standards;
2. Facebook complies with the General Data Protection Regulation and is certified under the Privacy Shield for data transfers;
3. Google complies with the General Data Protection Regulation and is certified under the privacy shield for data transfers. Google also complies with the Payment Card Industry Data Security Standards;
4. Paypal relies on Binding Corporate Rules approved by competent Supervisory authorities;
5. Stripe is certified under the EU-US Privacy Shield and EU Standard Contractual Clauses and Binding Corporate Rules.
6. Zoom is certified under the EU-U.S. Privacy Shield Framework and the Swiss-U.S Privacy Shield;
7. Whatsapp is certified under the EU-U.S. Privacy Shield Framework and the Swiss-U.S Privacy Shield;
8. Leadpages complies with GDPR and CCPA;
9. ActiveCampaign is heavily focused on GDPR, SOC 2, and HIPAA compliance
10. Wix stores data in United States of America, Ireland, Japan and Israel.
11. Kajabi stores data in United States of America.

Where we transfer data to parties not listed above that are outside of the EEA, then we will ensure that at least one of the following conditions is met:

1. You have given your express consent;
2. The country has an approved adequate level of protection for personal data;
3. It is legally required;
4. The relevant data protection authority authorises it.

Data security

We take the protection of your personal data seriously and have taken suitable and reasonable steps to protect the personal data we hold from misuse, loss, unauthorised access, and any modification or disclosure.

We limit access to your personal data to those employees, agents, contractors or third parties who have a business need to know. They will only process your data on our instructions and must keep it confidential.

If you are submitting personal data over the Internet that you wish to remain private, please note that while attempts are made to secure information transmitted to this site, there are inherent risks in transmitting information across the Internet. If you prefer, you can contact us by phone or mail.

Data retention

We will not keep your personal data for longer than is required about the purpose for which it was collected by us or provided by you, including any legal or record-keeping requirements and will take reasonable steps to destroy or permanently de-identify your personal data when it is no longer required.

Your rights about the data we hold

You have rights about your personal data. These include the right to access and receive a copy of your personal data, to ask us to correct any errors, to erase your personal data, to restrict or object to how your information is processed. You can find out more about your rights by visiting <https://ico.org.uk/your-data-matters/>.

To ensure the information we hold about you remains accurate, please contact us using the email address above if, at any time, your personal details change.

Where you have provided consent for us to process your personal data, you can withdraw that consent at any time. Should you wish to do so please contact us at the above email address.

Links to other sites

The Website may contain links to other sites. We are not responsible for the privacy practices of those websites and do not know whether cookies or other tracking devices are used on any such linked sites. If you have any concerns regarding the privacy of your information, you should ensure you are aware of the privacy policies of those sites before disclosing any personal information.

Changes to this Privacy Notice

We reserve the right to alter or amend it without notice. Should the Privacy Notice be altered, the new policy will be posted on the Website.

Your first use of our Website after the date of any amendments or alterations will constitute your acceptance of such changes; therefore, we recommend you review this Privacy Notice regularly to keep informed of any changes.

Should you have any questions about this privacy policy, please contact

info@xpiyouth.com