

Privacy Policy

Updated 06 April 2021

Your privacy is very important to us. Accordingly, we have developed this policy in order for you to understand how we collect, use, communicate and make use of personal information.

The following outlines our privacy policy.

When accessing the

<https://exmoorbusinessacademy.vipmembervault.com> website, we will learn certain information about you during your visit.

The following outlines our privacy policy.

Information on how we use your Personal Data

The Exmoor Business Academy takes your privacy very seriously so please read through our Privacy Notice. It includes information about:

- Why we collect and keep information about you.
- What information we collect.
- How long we may keep your information.
- Who may see your information.
- With whom we may share your information.

- Your rights concerning your information.

The Exmoor Business Academy (EBA) processes personal information (Personal Data) every day. This information is used by EBA and their associates as part of their normal work. We take our duty to protect your Personal Data very seriously and all processing will be in line with the General Data Protection Regulation 2016 (GDPR) and general UK Data Protection legislation.

Personal Data is any information by which an individual person can be identified. This includes a name, identification number, address, email address, IP address, photo, date of birth, and phone number. It also covers any factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of a person.

Processing includes the collection, recording, organising, storage, adapting, retrieval, use, erasure, or destruction.

We will take all reasonable means to keep your Personal Data confidential whether this is held on the computer, on paper, or other media. Every member of staff working with EBA has a legal duty to keep information about you secure and confidential. This is also included in associates, contractors, and partners' terms and conditions.

For any information please contact

The Exmoor Business Academy

2 Bossington Green, Minehead TA24 8HH.

Email: support@exmoorbusinessacademy.com

For Independent advice about data protection issues you can contact the Information Commissioner at Wycliffe House, Water Lane, Wilmslow Cheshire SK9 5AF Email: casework@ico.org.uk. Phone: 0303 123 1113
Website: www.ico.org.uk

1. What Information do we collect?

EBA aims to provide you with the highest quality of service. To do this we must keep records about you, and the services we have provided to you or plan to provide to you. We collect Personal data from you when you use our website <https://exmoorbusinessacademy.vipmembervault.com> or contact by email, telephone, post, or any other method and at any meetings we hold.

The Personal Data we hold about you is protected by strict physical, electronic, and other means and includes but is not limited to:

- Basic details about you such as your name
- Address and telephone number
- E-mail address
- Services and Materials provided
- Financial details
- Any information necessary for the provision of our Services.

We will also process Personal Data about our suppliers, any employees, independent contractors, advisers, and other advisers and professional experts.

We only process your Personal Data in accordance with the General Data Protection Regulation. This will be to provide you with appropriate services or to meet contractual or legal obligations including maintaining our accounts and records or because you have consented to provide us with the information.

EBA and their associates keep accurate and up-to-date information about the services you receive, and to enable them to provide you with the right advice about potential new services. It also ensures that any concerns you may have about your Services can be properly investigated.

If we intend to use the Personal Data for any other purpose, then you will always be asked first unless required to act otherwise by law.

Some data is deemed **Sensitive Data** and we can only process this with your consent. If the consent is not forthcoming or withdrawn, we may not be able to complete the provision of our Services with no liability on our part. Sensitive Data includes information about racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data biometric data, sex life or sexual orientation, and medical information. We do not process such information in the normal provision of our services.

2. With whom we may share your information

Information will be seen by Elke Koessling personally and any staff and contractors looking after you and by others involved in delivering your services. There is sometimes a need to share information about you with other Third-Party providers so that we can work together to provide you with the best possible service to meet your needs. We will only ever share your information when there is a legitimate need to do so.

It may also be necessary to share some information with:

- Suppliers
- Business associates and other professional advisers
- Financial organisations
- Official bodies
- Service providers including but not limited to online system providers such as Google, Mailchimp, Calendly, PayPal, Stripe, MemberVault.

We never share personal data with any other organisation for third party marketing purposes.

3. The Legal Basis for the Processing

The legal basis for the processing shall be:

1. Processing is necessary for the performance of a contract to which the individual is a party or to take steps at the request of the individual before entering a contract.
2. Processing is necessary to comply with our legal obligations

3. Processing is necessary for our legitimate interests or those of a third party except where overridden by the interests of the individual.
4. You have given your consent to the processing.
5. Processing is necessary for the performance of a task carried out in the public interest.
6. Processing is necessary to protect the vital interests of the data subject or another natural person.

4. Security of Processing

We are implementing strict technical and organisational measures to ensure Personal Data processed remains secure but absolute security cannot be guaranteed.

5. Transfers

It may sometimes be necessary to transfer Personal Data overseas. When transfers are needed, information may be transferred to countries or territories around the world. Any transfers made will be in full compliance with all aspects of GDPR and follow the country-specific legislation.

6. Marketing

We want to keep in contact with our Clients and those who have inquired about our services and keep them updated about our products, services, team news, and promotions by email and newsletters.

Any marketing communication sent to you will contain an option for you to unsubscribe should you not wish to receive any further such materials.

We will only send out marketing materials in accordance with GDPR requirements.

7. Keeping your information accurate and up to date

We will make sure that the information we hold about you is accurate and up to date. We may check with you from time to time to make sure we have the right information about you. If the information is not correct, you can ask us to change it.

8. Your rights

- You have the right to be informed about how your Personal Data is used. This document aims to explain how we use your information but if you are unsure or require more information, please ask SR.
- You have the right to have any inaccurate information about you corrected.
- You have the right to have information about you deleted or to stop us from using it when we do not need to keep it anymore. This is subject to our legal rights.
- You have the right to access your records (see below) using a Subject Access Request.
- You have the right to data portability so that you can use your information with an alternative service provider.
- You have the right to object to having your data processed for Direct Marketing purposes.

- You have rights concerning automated decision making and profiling.

9. Can I see my records?

You have the right to ask what personal information we hold about you and to request a free copy of the information. This is known as a Subject Access Request (SAR). SARs must be in writing and accompanied by proof of your identity and address. If you want specific information e.g. a particular time frame, please clarify this.

If someone is requesting information on your behalf, we shall need your written consent and evidence of ID for both of you.

We must provide you with the information you request within 30 days although we will endeavour to do so as soon as possible.

We have the right to charge for unreasonable requests e.g. repeated requests for the same information.

10. How long do we keep your records?

EBA keeps the information about you in electronic records. SR needs to keep this information to provide you with the best possible service. Certain types of information about you need to be kept for longer than other information. We will not keep information about you longer than is necessary or longer than required by law.

11. Complaints

If you need further information about the information that we keep about you, please speak to us. We will try to answer your questions. If you have any complaints, please send them to The Exmoor Business Academy in the first instance. If you are not satisfied with the response you should contact the Information Commissioner's Office Email: casework@ico.org.uk Phone: 0303 123 1113 Website: www.ico.org.uk.

You can write to them at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

12. Cookies

The internet pages of EBA use cookies. Cookies are text files that are stored in a computer system via an Internet browser. Many Internet sites and servers use cookies. Many cookies contain a so-called cookie ID. A cookie ID is a unique identifier of the cookie. It consists of a character string through which Internet pages and servers can be assigned to the specific Internet browser in which the cookie was stored. This allows visited Internet sites and servers to differentiate the individual browser of the data subject from other Internet browsers that contain other cookies. A specific Internet browser can be recognised and identified using the unique cookie ID. Using cookies, SR can provide the users of their website with more user-friendly services that would not be possible without the cookie setting.

Using a cookie, the information and offers on the EBA website can be optimised with the user in mind. Cookies allow us to recognise our website users. The purpose of this recognition is to make it easier for users to utilise our website. The website user that uses cookies e.g. does not have to enter access data each time the website is accessed, because this is taken over by the website, and the cookies are stored on the user's computer system. The data subject may, at any time prevent the setting of cookies through our website using a setting on their browser being used and so deny the setting of cookies. Already set cookies may be deleted at any time via the internet browser. This is possible on all popular internet browsers. If an individual deactivates the setting of cookies in the Internet browser used, not all functions of our website may be entirely usable.

13. General

You may not transfer any of your rights under this Privacy Notice to any other person. We may transfer our rights where we reasonably believe your rights will not be affected.

Unless otherwise agreed, no delay or omission by a party in exercising any right or remedy will be deemed a waiver of that or any other right or remedy.

This Notice will be governed by the laws of England and Wales.

This Notice will be updated from time to time and a copy of the latest version will be on our website.