Scaling Up Coaches - General Privacy Notice

We at Scaling Up Coaches are committed to protecting your privacy. This privacy policy applies to our websites: -

(www.scalingup.co.uk)

(location.scaling up.co.uk) & Any white label variants of the websites listed above.

This privacy policy governs our data collection, processing and usage practices. It also describes your choices regarding use, access and correction of your personal information. If you don't agree with the data practices described in this privacy policy, you should not use the websites or membership sites.

We periodically update this Privacy Policy. We will post any privacy policy changes on this page and, where significant, will email you further notices. While we will notify you of any material changes to the Privacy Policy, we also keep copies of the Privacy Policy for your review if needed.

If you have any questions about the Privacy Policy or our treatment of the information you provide, please write to us by email to <u>wendy@nealelewis.com</u> or by mail to Scale Up Coaches, Lyndor, Hole-in-the-Wall, Ross-on-Wye, Herefordshire HR9 7JW

Membership Sites

Our membership sites allow any company that uses our dashboard to create and share information. The site has an inbuilt CRM or Hubspot CRM where businesses can hold information of their clients. It is the responsibility of each individual business that uses the dashboard to be compliant with UK GDPR and protect data that has been given to them to provide the service. Scale Up Coaches will continue to review and implement the changes needed to ensure best practice.

Sensitive Information

This refers to credit or debit card numbers, personal financial account information, security numbers, passport numbers, driver's

license numbers or similar personal identifiers, racial or ethnic origin, physical or mental health condition or information, or other employment, financial or health information. Scale Up Coaches takes all data seriously and so only those who need to see this data (accounts team for example) have access to these records.

Information We Collect

You are free to explore our website and pages without the need to give us information about yourself. When you register for membership sites or request information then we request personal information about yourself that allows us to complete the task.

"Personal information includes that you voluntarily submit to us and that identifies you personally. Included would be name, email address, company name, address, phone number and other key information about yourself and your business. Both paid and free information that you enter into our web-forms or that can be seen via online sites like Facebook, Google for example can be classed as personal information that you may choose to submit.

Personal information also includes navigational or payment information which can directly or indirectly identify an individual. Navigational information refers to information about your computer and visits to this website such as your IP address, geographical location, browser type, referral source, length of visit and pages viewed.

Log Files

Whereas we don't use your online browsing history as part of our main business plan, we may choose to from time to time activate re-marketing to those who have shown an interest in our site pages via advertising. You will always have the option to remove yourself from this type of marketing.

Third Parties

Scale Up Coaches doesn't request information from third parties, nor does it ask for information from our membership businesses. If a business asks us to contact another business then it's on the understanding that the business is happy to receive communication from us.

Information About Children

Our websites are not intended for or targeted to children under the age of 16, and we do not knowingly or intentionally collect information about children under 16. If you believe that we have collected information about a child under 16, please contact us at <u>wendy@nealelewis.com</u> so that we may delete the information.

Collecting Information

We use the information we collect only in compliance with this Privacy Policy. Customers who subscribe to our Membership service are obligated through our agreements with them to comply with this Privacy Policy.

Selling Personal Information

We never sell personal information to any third party.

Use Of Personal Information

In addition to the uses identified elsewhere in this Privacy Policy, we may use your personal information to:

- Improve your overall experience with our products and services and to improve the membership service
- Send information or Scale Up Coaches content which we believe would be of interest to you by post, email or other means
- Promote use of our services to you and share promotional and informational content with you in accordance with your communication preferences
- Provide other companies with statistical information BUT this information will not be used to identify the individual user
- Send you information in regards to any changes to our terms and conditions
- Meet legal requirements

Our legal basis for collecting and using the information described above will depend on the personal information concerned and the specific context in which we collect it. We only normally collect personal information from you where we have consent to do so, where the personal information is needed to perform the task or where we have a legal obligation to collect the information from you.

If we collect information for a legal requirement you will be very aware of this and for what reason.

Navigational Information

We use Navigational Information to operate and improve the website and membership service. We may use the Navigational Information alone or in combination with Personal Information to provide you with personalised information about Luv4 Marketing.

Customer Testimonials & Comments

We post customer testimonials and comments on our website, which may contain limited personal information. We obtain customer's consent via email prior to posting the customer's name and testimonial.

Use Of Bank Or Card Details

If you give us credit card information, we use it solely to take the payments you have agreed to. We use third party service providers (mainly Paypal), which limits the need to hold your details in our systems.

Security Of Personal Information

Scale Up Coaches takes the minimum information required and holds it in secure servers. Team members are only permitted access to these files if they directly need access to complete a task.

Additional measures like passwords and pin codes are added to the files for further protection.

Social Media

Our website includes social media features such as the Facebook like and further widgets such as the share button. Share buttons can create a cookie via your IP address. As these buttons are third party plugins, the Scale Up Coaches Privacy Policy doesn't apply but instead is governed by the third party policies.

External Websites

Our website may provide links to other websites, We do not control and are not responsible for the content and practices of these websites.

Retention Of Information

How long we keep the information depends on the type of information. After an acceptable time we will delete the information or if not possible securely isolate the information so that it can't be used further.

We retain Personal Information that you provide to us where we have an ongoing legitimate business need to do so.

When we have no ongoing legitimate business need to process your personal information we securely delete the information or as above store it securely that can't be used.

If you subscribe via the membership section, our customers decide how long to retain the personal information they collect from you.

If you have elected to receive marketing communication from us, we retain information about your marketing preferences for a reasonable period of time from the date you last expressed interest in our content, products or services, such as when you last opened an email from us.

Sharing Your Data

Scale Up Coaches will not share your data, we house the data and use it as needed to complete the tasks. Where a third party could be of interest to you, we won't share your data but contact you directly if needed.

Compelled Disclosure

We reserve the right to use or disclose your personal information if required by law.

Privacy Protection

All Scale Up Coaches websites and pages are offered via a secure server to protect our visitors to the very best standards.

Accessing & Controlling Your Personal Data

(Reviewing, Correcting & Removing Your Personal Information)

- You can request access, correction, updates or deletion of your personal information
- You can object to processing of your personal information or request portability of your personal information
- If we have collected and processed your personal information with your consent, then you can withdraw your consent at any time.
- You have the right to complain to a data protection authority about our collection and use of your personal information.

To exercise any of these rights, please contact us at wendy@nealelewis.com or by mail to Scaling Up Coaches, Lyndor, Hole-in-the-Wall, Ross-on-Wye, Herefordshire HR9 7JW

The Legal Grounds For Using Your Information

This is common for all personal and sensitive data we collect and process about staff, clients, licensees, franchisees and any other individuals.

Some data is more sensitive than other types of data. These special categories are as follows: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information, health information, and information about sex life or orientation.

Legitimate Interests

This means that the processing is necessary for legitimate interests except where the processing is unfair to you. Scale Up Coaches relies on legitimate interests for many of the ways in which it uses information.

Specifically, Scale Up Coaches has a legitimate interest in:

- Providing educational services to contacts
- _Safeguarding and promoting the welfare of staff, clients, licensees, franchisees & others

Promoting the objects and interests of Scale Up Coaches

Ensuring the efficient operation of Scale Up Coaches

Compliance with all relevant legal obligations of Scale Up Coaches

Keeping the Scale Up coaches community informed about events, news and activities

Necessary For A Contract

Information about individuals may be necessary to perform our obligations under our contracts.

For example, maintaining the Scale Up Coaches Management Information System database.

Vital Interests

For example, to prevent someone from being seriously harmed or killed.

Legal Claims:

The processing is necessary for the establishment, exercise or defence of legal claims. This allows us to share information with our legal advisors and insurers.

If you disagree with any decision we make about your data you can use our complaints policy, you also have the right to make a complaint to the Information Commissioner, and sometimes to the Information Tribunal or through the court process. Our complaints policy is available on the website.