

### **PRIVACY & COOKIES POLICY**

We are Anna Standing Wellbeing Coach & Reflexologist, the owner of www.annastanding.com and the Anna Standing Wellbeing brand ("AS Wellbeing", "we", "our", or "us"), and we care about your digital privacy. We will process and use your data securely and in accordance with data protection regulations around the world that may apply to you.

We are registered as a data controller with the regulatory body in UK with the registration identifier of ZA359707.

This Privacy Policy explains what information we collect from you, the purposes we collect that information for, and how we process it. This Privacy Policy also explains your rights that apply to data we have about you, and how to use those rights.

The terms "you" and "your" refers to anyone who:

- a) uses, visits and/or views our website,
- b) accesses any of our content, or
- c) purchases any content, product(s), or service(s) from us.

By visiting and using the website, or making a purchase from us, you accept and agree to be bound by this Privacy Policy.

We may change or update this Privacy Policy without notifying you. The latest version can always be found on our website.

Your continued use of the website after posting of any changes to our Privacy Policy means you accept the changes. You must not access or use the website if you do not wish to be bound by this Privacy Policy.

If you have questions about this Privacy Policy, you can contact us at info@annastanding.com.

#### **OUR ROLE IN YOUR PRIVACY**

If you are a AS Wellbeing customer or subscriber, access or download any of our free content, or you're just visiting our website, this policy applies to you.

## **Our Responsibilities:**

- Whether you are a registered user or just a visitor to our website, we act as a "data controller" of your personal data. This means that we determine how and why we collect and process your data.
- We will collect, store, and process your data in accordance with this Privacy Policy and applicable laws.

## Your Responsibilities:

- You should read this Privacy Policy and check it again from time to time, as we may change or update it.
- If you are a customer or subscriber, you should also check any contracts between us (including Terms & Conditions, which are a contract). Our contracts may include further details on how we collect and process your data.
- You will only provide us with personal information about other people if you have the right to authorise us to process it on your behalf in accordance with this Privacy Policy.

### WHEN AND HOW WE COLLECT DATA

Any time you interact with AS Wellbeing, we are collecting data. Sometimes you provide us with data, and sometimes data about you is collected automatically.

Here's when and how we do this:

YOU	WE
GIVE	COLLECT
DATA	DATA

חות	מאות	
	✓	You browse any page of our website
✓	✓	You download any of our free resources ("freebies")
✓		You contact us (using our contact form, by email, or on social media)
✓		You opt-in to marketing messages
	✓	You receive emails from us
✓	✓	You make a purchase from us
	✓	You attend one of our live sessions
	✓	You watch a pre-recorded session or course
✓		You provide feedback or testimonials

## **TYPES OF DATA WE COLLECT**

## **Contact details**

Your name, address, phone number, email address, social media handles, and any alternative contact details you may provide.

### **Financial information**

Your bank details, credit/debit card details, PayPal account details, or any other payment methods

### Data that identifies you

Your IP address, login information, browser type and version, device type, time zone settings, browser plug-ins, geolocation information about where you might be, operating system and version, and other information that is collected automatically about your activity on our website.

# Data on how you use our website

Your URL clickstreams (the path you take through our site), products/services viewed or placed into cart, page response times, error messages, how long you stay on our pages, what you do on those pages, how often, and other actions you take on our website.

## What about really sensitive data?

We don't collect any "sensitive data" about you (like race, ethnicity, political opinions, religious/philosophical beliefs, union membership, genetic data, biometric data, data about your sexual life or preferences, or any alleged/actual offences) except when we have your specific consent or when we have to in order to comply with the law.

#### What about children's data?

We are a business that provides content, products, and services which are directed to and intended for use by only individuals over the legal age of adulthood (which happens to be 18 years old in most places in the world).

While we do provide free and paid resources that are for use by children, all of them are directed to be consumed and/or purchased by the adult parents of those children, not the children themselves.

Nothing we provide is targeted at children, and we do not knowingly collect any personal data from any person under the legal age of adulthood. If you believe that personal information was collected without parental or guardian consent from a child, please contact us to have that information deleted.

### **HOW AND WHY WE USE YOUR DATA**

Data protection laws restrict us in how we can use your data. These laws only allow us to use your data for certain reasons, which we must have a legal basis for. Here are the reasons for which we process your data:

## **Running our business**

Managing your requests (like creating and managing your account, answering your questions, processing your purchases), login and authentication, remembering your settings and preferences, processing payments, hosting and back-end infrastructure.

Legal basis: contract, legitimate interest

## Improving our content, products, and services

Testing features, interacting with feedback, managing landing pages, heatmapping our site, traffic optimisation, data analysis and research, profiling, and using machine learning techniques to analyse data. This may be done by us or by an external person/company that we use to provide services to us.

Legal basis: contract, legitimate interest

## **Customer support**

Providing essential information and updates on any product or service which you are signed up for or have access to (including free challenges/events) and resolving issues (technical, financial, or otherwise). This may be by phone, email, chat, social media, or in a community group hosted on our website or another platform we use.

Legal basis: contract, consent

## Advertising and marketing

Sending you emails and messages about new features, offers, products, and services as well as informational content.

Legal basis: consent

Here is an explanation for each of the legal bases we use:

#### Consent

You have given us clear consent to process your personal data for a specific purpose.

You can change your mind! If you have previously given your consent, you can freely withdraw that consent at any time. All you have to do is let us know at info@annastanding.com (we're not mind readers, after all).

If you withdraw your consent, we will immediately stop processing your data unless we have another legal basis to process the data. If we do have another legal basis to process your data, we may continue to do so as long as that legal basis remains valid.

#### Contract

Processing your data is necessary as part of a contract you have with us, or if we have asked you to take specific steps before entering into a contract with us.

Please remember that Terms & Conditions are a type of contract. If you've ticked a box agreeing to our Terms & Conditions (for example, as part of a purchase), you've effectively "signed" a contract with us.

## **Legitimate Interests**

Processing your data is necessary for our legitimate business interests or the legitimate business interests of another person/company we work closely with. Examples of legitimate interests include:

- gaining insights from your behaviour on our website or any platforms we use
- delivering, developing, and improving our content, products, and services
- enabling us to improve, customise, or modify our content and communications
- determining whether marketing and advertising campaigns are effective
- verifying and enhancing data security

In each case, our legitimate interest is only valid if it is not outweighed by your rights and interests. We respect your rights, and we carefully evaluate if a legitimate interest is strong enough to justify processing your data.

### YOUR PRIVACY CHOICES AND RIGHTS

You have choices and rights when it comes to your data. To exercise your rights, you can email us at info@annastanding.com.

You can choose not to provide us with personal data

If you choose to do this, you can continue to use our website and the content you see on it. However, you may be unable to download, access, or purchase additional content, such as PDF "freebies", webinars, events, or paid products/services.

## You can choose to turn off cookies in your browser by changing the browser settings

You can block cookies by activating a setting in your browser that refuses all cookies. You can also delete cookies through your browser settings. If you turn off cookies, you can continue to try to use our website, but it may not load/function effectively (or at all).

## You can choose to tell us not to use your data for marketing

We will inform you before collecting your data if we intend to use that data for marketing. If you've previously opted-in to marketing, you can change your preferences by using the "unsubscribe" button in any marketing email you've received from us, or just let us know by email at info@annastanding.com.

## You have the right to access information we hold about you

You can ask us for additional information about:

- the categories of data we're processing
- the purposes for data processing
- the categories of third parties that we disclose data to
- how long we store data (or the criteria we use to decide storage times)
- your other rights regarding our use of your data

If you make a request, we will respond to your request within one month, unless we have a valid reason to deny your request (for example, if responding to your request would negatively affect the rights and freedoms of others, including the right to confidentiality or intellectual property rights).

### You have the right to make us correct any inaccurate personal data about you

You can contact us at any time to let us know your most up to date information (changed your name, moved to a new address, or anything else).

You can object to us using your data for profiling you or making automated decisions about you We may use your data to determine whether we should let you know information that may be relevant to you (for example, you may receive some emails and not others based on your past behaviour). Otherwise, the only circumstances in which we do this is to provide our products/services to you (the nature of what we're providing may require some customisation to benefit you).

## You have the right to be 'forgotten' by us

You can do this by asking us to delete any personal data we have about you. However, please understand that where we have contractual, regulatory, legal, or other essential reasons to hold on

to your data, we may keep some of your data (only what we actually need and only as long as we actually need it).

### You have the right to file a complaint about our use of your data

If you have a complaint, please let us know and give us a chance to address it and ease your concerns first. If we fail at this, you can submit your complaint to the regulatory body that deals with data privacy in your country.

### **HOW DO WE SECURE YOUR DATA?**

We have physical, electronic, and managerial processes to ensure your data is secure. However, there are people with bad intentions in the world, and no data is ever 100% secure. Please also understand that we are a small business, and we don't have the budget, systems, or expertise that large businesses do, so we do the best we can with what we have.

### A few reminders:

- Providing your personal data is at your own risk, because unfortunately, no data transfer can be guaranteed as secure.
- You are responsible for keeping your login details (username, password) secret and safe.
- If you believe your privacy has been breached, please let us know as soon as possible.

### WHERE IS YOUR DATA TRANSFERRED AND PROCESSED?

Anna Standing Wellbeing Coach & Reflexologist is based at 6 Rowlatt Drive, St Albans, Herts, AL3 4NB, UK, and the physical devices (such as computers, mobile phones, tablets, etc.) that we use to access and hold your data are often at this location. However, some or all of our physical devices are mobile, and your data is often stored and processed in the "cloud" by us and other third parties, as described in this Privacy & Cookies Policy.

As a small business, we rely on third parties (aka other people/businesses) to provide services to us that are essential to the day-to-day operation of the business. This includes website hosting, video conferencing, legal and accounting services, email service, social media scheduling, freelancers, payment providers, technology providers, and many, many more. We simply wouldn't be able to run AS Wellbeing without these third party services.

When we use these third party services, it is necessary for us to share your data with them in order to receive the services. Because our online presence provides the possibility to reach customers anywhere in the world, it is not practical for us to even attempt to use third party services that store and process data locally (based on each individual's location when they share data with us). Therefore, we partner with third parties who we believe are the best providers, while balancing service levels, cost, and respect for data privacy.

When we transfer your data to a third party and they process it, we have very little control over the location of the data's storage and processing. Often, this means that your data is transferred to other places in the world and processed there. We know for a fact that some of our third party providers transfer and process your data in the United States and other locations outside the EEA (European Economic Area).

By sharing your personal data with us, you explicitly agree to this transfer, storing, and processing by us and our third parties anywhere in the world, including in countries that are not approved by the European Commission as having an adequate level of protection for personal data.

### **HOW LONG DO WE STORE YOUR DATA?**

We only store your data as long as it is required to fulfil the purpose for which it was collected. For example, we keep a record of your email address and "unsubscribe" preference to ensure we respect your choice not to receive marketing messages from us.

We will also store your data for as long as reasonable and necessary to comply with legal and tax requirements.

If we no longer have any need to continue to store your data, we delete it.

## **COOKIES AND HOW WE USE THEM (NOT EAT THEM)**

We use cookies on our website (not the fresh-baked kind, sadly).

You can control your cookie preferences through the cookie banner that appears when you visit our website.

However, the cookie banner does not allow you to disable essential cookies, which are required for our website to function. Unless you adjust your browser settings to refuse cookies, we (and third parties that provide services to us) will activate some cookies when you interact with our website.

These may be 'session' cookies, meaning they delete themselves when you leave our site, or 'persistent' cookies which do not delete themselves and help us recognise you when you return so we can provide a tailored service.

These cookies, while not very tasty, do serve a purpose. And not just for us – for you too! Some cookies are essential, meaning they are needed to make our website work. And some are simply convenient, like the cookie that is activated when you tick the box for "Remember my password".

### How can you block cookies?

You can block cookies by activating a setting on your browser that blocks the creation of cookies. You can also delete cookies through your browser settings. If you use your browser to disable, reject, or block cookies (including essential cookies), certain parts of our website will not function properly. In some cases, the website may not work at all.

### Third party cookies

"Third party" refers to a person/business that is not you or us. We use third parties to provide services that help us run our business and deliver great products and services. These third parties use cookies too.

If you access a third party website or platform where we have some of our content, products, or services, that third party has its own privacy policy and cookie policy which may differ from ours.

Please note that where third parties use cookies, we have no control over how those third parties actually use those cookies.