

Privacy Policy

Pauline McNulty ('The Data Controller') will collect the personal details that you provide to us on our website and otherwise for the purposes of providing you with services and/or information. In providing such services and/or information to you we will only use your personal data in accordance with the terms of the following statement.

This statement sets out below:

1. How the Data Controller collects your personally identifiable information through this website, along with email, meeting booking systems, and during meetings or coaching sessions (collectively referred to as 'Other Methods' throughout this policy).
2. How the Data Controller uses this information.
3. Who the Data Controller may share the information with and for what purpose(s).
4. What choices are available to you regarding collection, use and distribution of your information.
5. The kind of security procedures that are in place to protect the loss, misuse or alteration of information collected through the Data Controller's website or via Other Methods
6. How you can correct any inaccuracies in the information collected through the website.

If you feel that this company is not abiding by its posted privacy policy, you should first contact: hello@paulinemcnulty.com

Information Collection and Use

General

Personal data means any information capable of identifying an individual. By providing us with your data, you warrant to us that you are over 18 years of age.

The Data Controller collects information from our users at several different points on our website. The Data Controller is the sole owner of the information collected on this website and via Other Methods. We will not sell, share, or rent this information to others.

Personal data means any information capable of identifying an individual. By providing us with your data, you warrant to us that you are over 18 years of age.

We may collect data about you by you providing the data directly to us (for example by filling in forms on our site, via a third-party form platform such as Google based outside the EU, or by sending us emails). We may automatically collect certain data from you as you use our website by using cookies and similar technologies. Please see our cookie section below for more details about this.

We may receive data from third parties such as analytics providers such as Google based outside the EU, advertising networks such as Facebook based outside the EU, such as search

information providers such as Google based outside the EU, providers of technical, payment and delivery services, such as data brokers or aggregators.

We may also receive data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

Marketing

This includes data about your preferences in receiving marketing from us and our third parties and your communication preferences. We process this data to enable you to partake in our promotions such as competitions, contests and special offers, to deliver relevant website content and advertisements to you and measure or understand the effectiveness of this advertising.

If you have consented to be contacted in this way, you may opt out at a later date. You have a right at any time to stop us from contacting you for marketing purposes by unsubscribing or emailing us at hello@paulinemcnulty.com.

Our lawful ground for this processing is our legitimate interests which in this case are to study how customers use our products/services, to develop them, to grow our business and to decide our marketing strategy.

Purchasing

Information to support the purchase of goods and/or services can include your name, title, billing address, delivery address email address, phone number, contact details, purchase details and your card details. We process this data to supply the goods and/or services you have purchased and to keep records of such transactions. Our lawful ground for this processing is the performance of a contract between you and us and/or taking steps at your request to enter into such a contract.

Coaching

We need to collect the following sensitive data about you in order to provide you with the coaching you have requested.

- Coaching Session Data – If you take part in an introductory session or a subsequent coaching session with us, then you will be required to acknowledge that we will take notes relating to our conversation during the session. These notes may contain sensitive data that you share with us during a session.
 - The notes will be processed and retained by us on the grounds of legitimate interests, which in this case are to provide a high level of coaching services.
 - We will also retain the notes on the grounds of legal obligation and Article 9, Paragraph 2 (f) of GDPR which states that sensitive data can be processed when it is necessary for the establishment, exercise or defence of legal claims. Notes must be taken and retained for at least seven years for insurance purposes.
 - Handwritten notes will be stored in a locked cabinet and subsequently digitised, and the paper copies then shredded.

- Session notes may also be emailed to you for your record. This means that your sensitive data will be processed by our email provider and hosting company.
 - From time to time you may be asked to provide feedback or a testimonial. Your responses will be processed on the grounds of legitimate interests, which in this case are to provide a high level of coaching services. Testimonials may be published on our website with your consent.
 - On occasion we may request your permission to record a session. This will be for our own review of the session, or to be played to supervisors for assessment/accreditation purposes. This data will be processed on the grounds of legitimate interests, which in this case is to obtain accreditation or to develop our own coaching skills. The recorded sessions will be deleted once they are no longer required.
- Communication Data – If you communicate sensitive data to us through other means (such as email), we will retain that data on the grounds of legitimate interests, legal obligation and Article 9, Paragraph 2 (f) of GDPR , in the same manner as the consultation data above.

Cookies

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.aboutcookies.org or www.allaboutcookies.org. Please note that in a few cases some of our website features may not function if you remove cookies from your browser.

Log Files

We use IP addresses to analyse trends, administer the site, track users' movements, and to gather broad demographic information for aggregate use. IP addresses are not linked to personally identifiable information.

Sharing

We may share aggregated information on our website. This is not linked to any personal information that can identify any individual person.

We may have to share your personal data with the parties set out below:

- Service providers who provide IT, backup and system administration services
- Professional advisers including lawyers, bankers, auditors and insurers
- Government bodies that require us to report processing activities
- Third parties to whom we sell, transfer, or merge parts of our business or our asset

Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Links

This website contains links to other external websites. Please be aware that the Data Controller is not responsible for the privacy practices of such other sites. We encourage you to be aware of this when you leave our site and to read the privacy statements of each and every website that collects personally identifiable information. This privacy statement applies solely to information collected by the Data Controller's website.

Security

The Data Controller takes every precaution to protect our users' information. As part of this, our website is built upon a robust platform which is continuously scanned for vulnerabilities and intrusion attempts and is updated as appropriate.

Third party service providers who need the information to perform a specific job (for example, our bookkeeper or a virtual diary manager) are granted access to your information securely.

The Data Controller uses all reasonable efforts to safeguard your personal information. However, you should be aware that the use of the Internet is not entirely secure and for this reason the Data Controller cannot guarantee the security or integrity of any personal information which is transferred from you or to you via the Internet.

If you have any questions about the security at our website, you can send an email to hello@paulinemcnulty.com

Correction/Updating Personal Information

If your personally identifiable information changes (such as office address), we will endeavour to provide a way to correct, update or remove the personal data provided to us. This can usually be done by emailing us at the address above.

Notification of Changes

If we decide to change our privacy policy, we will post those changes on our Homepage so our users are always aware of what information we collect, how we use it, and under circumstances, if any, we disclose it. If at any point we decide to use personally identifiable information in a manner different from that stated at the time it was collected, we will notify users by way of an email. Users will have a choice as to whether or not we use their information in this different manner. We will use information in accordance with the privacy policy under which the information was collected.

This policy was last updated 29th April 2020.

Complaints or queries

The Data Controller tries to meet the highest standards when collecting and using personal information. We take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures. If you wish to complain about this policy or any of the procedures set out in it please contact: hello@paulinemcnulty.com

As an individual whose personal data is processed by us you have rights which have come into effect with new GDPR regulations from 25th May 2018. Your rights are explained in detail at <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr>.

You also have the right to lodge a complaint about our processing with the UK's Information Commissioner's Office (ICO) on <https://ico.org.uk/concerns>.