



WXL
COACHING

www.wxl.coach

PRIVACY POLICY

INTRODUCTION

WXL Services Limited (trading as “**WXL Coaching**” and referred to as “**we**”, “**us**”, “**our**”) respects your privacy and is committed to protecting your personal data. This privacy policy (the “**Policy**”) will inform you about how we look after your personal data when you visit our website www.wxl.coach (the “**Site**”) and tell you about your privacy rights and how the law protects you. Please also use the Glossary at the end of this Policy to understand the meaning of some of the terms used in this Policy.

IMPORTANT INFORMATION

Purpose of this privacy policy

The Policy aims to give you information about how we collect and process your personal data through your use of the Site. It is important that you read this Policy so you are fully aware of how and why we are using your data. This Policy supplements other notices and privacy policies and is not intended to override them.

Controller

WXL Services Limited is the controller and is responsible for your personal data. If you have any questions about the Policy, including any requests to exercise your legal rights, please do so by using the contact details below.

Contact details

Our contact details are **(i)** by post via WXL Services Limited, 64 Ridgmount Gardens, London, EC4A 1DE; or **(ii)** by email via info@wxl.coach; or **(iii)** by phone via 077 7088 3207

Complaints

You have the right to complain at any time to the Information Commissioner's Office (**ICO**), which is the UK supervisory authority for data protection issues (www.ico.org.uk). However, we would like the chance to deal with your concerns before you do this, so please contact us in the first instance.

Changes to the Policy and your duty to inform us of changes

We keep the Policy under review. It is important that the personal data we hold about you is accurate and current. Please inform us if your personal data changes during our relationship.

Third-party links

The Site may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave the Site, we encourage you to read the privacy policy of every website you visit.

THE DATA WE COLLECT ABOUT YOU

Data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed. We may collect, use, store and transfer the following different kinds of personal data about you:

- **Contact Data:** includes billing address, delivery address, email address and telephone numbers.
- **Identity Data:** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Finance Data:** includes bank account and payment card details.
- **Marketing and Communications Data:** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Profile Data:** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Technical Data:** includes internet protocol (IP) address, any login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Transaction Data:** includes details about payments to and from you and other details of what you have purchased from us.
- **Usage Data:** includes information about how you use our website, products and services.

We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data, but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data under the Policy.

We may collect **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). By signing a Coaching Agreement with us you will have been asked to give us your specific consent to do so. We do not collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (e.g. to provide you with services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions:** you may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us. This includes personal data you provide if/when you ask us to provide you with our services; create an account on our website; subscribe to our service or publications; request marketing to be sent to you; enter a competition, promotion or survey; or give us feedback or contact us.
- **Automated technologies or interactions:** as you interact with the Site, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our **Cookie Policy**, which is in the Small Print part of the Site.
- **Third parties or publicly available sources:** we will receive personal data about you from various third parties and public sources as set out below:
 - **Contact Data:** from providers of technical / payment / delivery services inside or outside the EU and from publicly available sources such as Companies House and the Electoral Register.
 - **Finance Data:** from providers of technical / payment / delivery services inside or outside the EU.

- **Identity Data:** from publicly available sources such as Companies House and the Electoral Register based inside the EU.
- **Technical Data:** from analytics providers such as Google based outside the EU; from advertising networks inside or outside the EU; from search information providers inside or outside the EU.
- **Transaction Data:** from providers of technical / payment / delivery services inside or outside EU.

HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to, which will usually be as follows:

- where we need to perform the contract we are about to enter into or have entered into with you.
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data, although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

The table below shows all the ways we may use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. We may process your personal data for more than one lawful ground depending on the purpose for which we are using your data. Please contact us if you need details about the specific legal ground that we are relying on to process your personal data where more than one ground appears below.

PURPOSE / ACTIVITY	TYPE OF DATA	LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST
To register you as a new client	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your services including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Finance (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how clients use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how clients use our products/services, to develop them and grow our business)

To administer and protect our business and this website (e.g. troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and adverts to you and measure or understand the effectiveness of the adverts we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how clients use our services, to develop them, to grow our business and inform our marketing)
To use data analytics to improve our website, services, marketing, client relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of clients for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing

We try to give you choices about personal data uses, particularly around marketing and advertising.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, warranty registration, product/service experience or other transactions.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our **Cookie Policy**, which you can find in the Small Print section on the Site.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain

the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the **External Third Parties** for the purposes set out in the table above. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

INTERNATIONAL TRANSFERS

We share your personal data with Google. This may involve transferring your data outside the EEA. We will only transfer your personal data to countries that are deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#). Where we use providers based in the USA, we may transfer data to them if they are part of the Privacy Shield, which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

DATA SECURITY

We have in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

DATA RETENTION

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation about our relationship with you. To determine the retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal or similar requirements. By law we have to keep basic information about our clients for six years after they cease being clients for tax purposes.

YOUR LEGAL RIGHTS

You have rights under data protection laws in relation to your personal data to do the following:

- **Request to your personal data - commonly known as a "data subject access request":** this lets you receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of your personal data:** this enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data:** this lets you ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing of your personal data:** this applies where we are relying on a legitimate interest (or those of a third party) and there is something about your situation that makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have

the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information that override your rights and freedoms.

- **Request restriction of processing your personal data:** this lets you ask us to suspend processing your personal data in the following scenarios: **(i)** if you want us to establish the data's accuracy; **(ii)** where our use of the data is unlawful but you do not want us to erase it; **(iii)** where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; **(iv)** you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request transfer of your personal data:** we will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you
- **Right to withdraw consent:** this applies at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer if your request is complex or you have made a number of requests, but we will keep you updated.

GLOSSARY

Comply with a legal obligation: means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

External Third Parties: means all or any of the following: professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services and/or HMRC, regulators and other authorities acting as processors or joint controllers based in the UK who require reporting of processing activities in certain circumstances.

Legitimate Interest: means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Performance of Contract: means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering such a contract.