# **Privacy Policy**

Last updated: December 2025

Your personal data will be treated with care, privacy and respect. This policy explains how Zoe Thompson trading as ZoeThompson.UK collects, uses, and protects your personal information in accordance with UK data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Personal information may be used to enable the creation of self-development, training and coaching programmes and products, to maintain accounts and records, to comply with regulations and insurer requirements, and for marketing and promotional materials.

We will request and retain only the information that is needed. If your information changes, please let us know by emailing support@zoethompson.uk.

#### Who We Are

Zoe Thompson trading as ZoeThompson.UK is the data controller responsible for your personal data. You can contact us about anything relating to this policy by emailing support@zoethompson.uk.

Our ICO registration is valid until July 2026.

### **Key Terms**

**Personal data** is any information that identifies a particular living person.

**Special Category Data** refers to information that relates to a person's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health, sexual life or sexual orientation.

**Process** is the act of doing something with personal information, including collecting, storing, altering, adapting, or deleting it.

#### Who We Process Data About

We may process information about you if you fall into one of these categories:

- Enquirers (people who express an interest in our products or services)
- Clients (organisations and individuals who receive our products or services by directly contracting with us)
- Participants (individuals who receive our products or services as a result of their organisation or another entity contracting with us)
- Suppliers (who sell us goods and services)
- Associates (who support the delivery of our products or services, such as trainers and guest speakers)
- Subscribers (who elect to receive updates from our website or mailing lists)
- · Visitors to our website

### Where We Get Your Data

Most of the data we process is provided by you, for one of the following reasons:

- You have enquired about our products or services
- You have contracted with us for our products or services
- You have participated in one of our programmes

- You have, or are considering contributing to our products or services
- You supply or have the potential to supply us with products or services
- · You have subscribed to receive website updates or similar
- You have visited our website
- You have made a complaint or information request to us

We may receive personal information indirectly, in the following scenarios:

- We have received your information from your organisation (our Client), because you will be acting on their behalf
- We have received your information from your organisation (our Client), because you will be, or have been a recipient of our products or services
- We have indirectly collected your information from analytics providers, or from your use of our website

We may generate data that relates to you, based on your interactions with us and data you have already provided, for example when:

- · We process financial transactions and create a record of your financial history with us
- We process records of your engagement with our products or services

### **What Personal Data We May Collect**

We may process the following information about you:

- Your name and contact details (such as email address, postal address, telephone number)
- Your business name and business contact details (such as job title, email address, postal address, telephone number)
- Your financial details (such as invoices, payments)
- · Details of products or services you have received or enquired about
- Your communication preferences
- Your dietary and accessibility requirements and preferences (if you are attending our events)
- Technical data (such as your IP address, login data, your use of our website)
- Any other information you provide to us through our website, over the phone, by email, or otherwise

# **Legal Basis for Processing**

We process your personal data under the following legal bases as defined by UK GDPR:

- Contract performance: Processing necessary to provide our coaching, training, and events services
- **Legitimate interests:** Processing necessary for our business operations, such as responding to enquiries and improving our services
- Legal obligation: Processing necessary to comply with HMRC, insurance, and regulatory requirements
- Consent: Where we have obtained your specific consent, such as for marketing communications

# **How We May Use Your Data**

We may process your data in order to:

- Respond to enquiries you make about our products or services
- Create and carry out a contract with you to deliver our products or services
- Respond to communications, enquiries or complaints relating to contracts
- Process financial transactions that enable you to purchase our products or services

- Keep records of products and services you order, and communications that relate to those orders
- Inform you of similar products or services to those you have already enquired about or received from us
- Comply with any legal obligations we are subject to or as required by a government authority
- Obtain or maintain insurance policies
- Obtain professional advice
- Administer, protect, and improve our products, services, business and website
- Monitor and analyse the use of our website

### If You Do Not Provide Personal Data

Where we need to collect your personal data by law, or under the terms of a contract we have (or are trying to create) with you, and you do not provide that data when requested, we may not be able to create or perform the contract (for example, to provide you with our products or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

### Who We Share Your Data With

We do not sell, provide, share, or exchange your personal data to anyone else for marketing, research, or other purposes.

We may sometimes outsource business functions to other people, who need access to some of your data so they can meet their legal and contractual requirements. For example:

- People providing our accountancy service have access to customer and supplier information that is part of the invoicing and payments system
- People providing catering services for our events may have access to your name and dietary preferences
- People providing venue services for our events may have access to your name and accessibility requirements

We may also be required, on occasion, to share your data with third party legal and regulatory bodies, such as HMRC, regulators and other authorities. In all instances, we share only the data that is appropriate and necessary for the purpose.

### **How Long We Retain Your Data**

Data retention periods are:

- Clients, Suppliers and Associates: 7 years following the end of our relationship to satisfy our obligations to HMRC and insurers
- **Enquirers:** 3 years after most recent activity or communication
- **Participants:** We delete your data after we have returned it to the organising Client at the end of our contract with them (unless you have migrated to another category by contacting us directly or joining one of our programmes)
- Subscribers: For as long as you choose to remain subscribed. You can unsubscribe at any time
- Website visitors: If you leave a comment, the comment and its metadata are retained for 3 years

#### Where We Store and Transfer Your Data

We use mainstream software and packages to administer our business, including Google services, Microsoft OneDrive, Stripe (payment processing), Xero (accounting), and Go High

Level (customer relationship management). Your data is primarily stored within the United Kingdom and the European Economic Area.

Some of our service providers may transfer data outside the UK. Where this occurs, we ensure appropriate safeguards are in place, including the UK International Data Transfer Agreement (IDTA), EU Standard Contractual Clauses (SCCs), or adequacy decisions recognising that the destination country provides an adequate level of data protection equivalent to UK GDPR.

### **Your Rights Over Your Data**

Under UK GDPR, you have the following rights:

- Right of access: Request a copy of the data we hold about you
- Right to rectification: Have inaccurate or out-of-date data corrected
- **Right to erasure:** Request your data be deleted (this does not include data we are obliged to keep for regulatory, statutory, accounting, taxation or insurance purposes)
- Right to restrict processing: Request that we stop processing your data in certain circumstances
- Right to data portability: Receive your data in a structured, commonly used format
- **Right to object:** Object to processing based on legitimate interests
- Right to withdraw consent: Where processing is based on consent, you may withdraw it at any time
- Right not to be subject to automated decision-making: You have the right not to be subject to decisions based solely on automated processing that produce legal or similarly significant effects

To exercise any of these rights, please email support@zoethompson.uk.

#### **How We Protect Your Data**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We also limit access to your personal data to those agents, contractors and other third parties 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 put in place procedures to deal with any suspected personal data breach and will notify you and the Information Commissioner's Office of a breach where we are legally required to do so.

# **Marketing Communications**

We will only send you marketing communications if you have given us your consent or where we have another lawful basis to do so (such as the soft opt-in exception for existing customers under PECR, where we may contact you about similar products or services). You can opt out of marketing communications at any time by clicking the unsubscribe link in any email we send or by contacting us at support@zoethompson.uk.

#### Cookies

Our website uses only essential cookies that are necessary for the website to function properly. These cookies do not collect personal data and do not require your consent. We do not use cookies for analytics, advertising, or tracking purposes.

# **Complaints**

If you have a complaint about the way we collect or process your personal data, or about the way we have responded to a request for information, correction, or erasure, please email us at support@zoethompson.uk in the first instance.

If we are unable to resolve the issue, you have the right to lodge a complaint with the Information Commissioner's Office. You can contact them by telephoning 0303 123 1113, via their website at <a href="ico.org.uk">ico.org.uk</a>, or at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England, UK.

### **Changes to This Policy**

We may update this privacy policy from time to time. Any changes will be posted on our website at www.zoethompson.uk. Where appropriate, we will notify you of significant changes by email.

### **Contact Us**

For any questions about this privacy policy or how we handle your personal data, please contact us at <a href="mailto:support@zoethompson.uk">support@zoethompson.uk</a>.