

# Carol Glover Coaching Privacy Policy

Carol Glover Coaching (CGC), owned by Dancing Spirit Bear Ltd (DSB), an IOM company, is committed to be a responsible custodian of the information you provide to us and the information we collect in the course of operating our Coaching and consultancy business. CGC is committed to complying with the requirements of the Data Protection Act 2018 and the Principles under the EU GDPR.

This Privacy Policy sets out how CGC may collect, use and share information and describes:

- How to contact us
- Complaints
- The types of information, including personal information, we may collect.
- How we may use and share the information we collect.
- Legal grounds for using personal information.
- The measures we have in place to protect and safely store the information we collect.
- Retention of the information we collect.
- Your choices and rights in respect of the information we hold.
- Changes to this privacy policy

## DATA CONTROLLER AND DATA PROCESSOR

DSB is the Controller of all Personal Data relating to our personnel and personal data used in our business for our own commercial purposes. DSB is also a Data Processor relating to the processing of personal data on written instruction of a Data Controller i.e. a third party to whom CGC provides consultancy services to. DSB is registered with the Information Commissioner as a Data Controller and Data Processor.

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, or have any complaints, please contact the DPO using the details set out below.



**Carol Glover**  
"THE MAVERICK MAKER"  
W: [carolglovercoaching.com](http://carolglovercoaching.com)  
E: [carol@carolglovercoaching.com](mailto:carol@carolglovercoaching.com)  
M: (+44) 7577 635142 & IOM (+44) 7624 482126

CONNECT WITH ME:  
in f Instagram S

Dancing Spirit Bear is registered in the Isle of Man, Company Number 331452C.  
Address: Rosemanly New Castletown Road, Douglas, IM2 1HP. Directors: Carol Glover and Peter Glover

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Contact details

Name of DPO: Carol Glover

Email address: [carol@carolglovercoaching.com](mailto:carol@carolglovercoaching.com)

Postal address: Rosemanly, New Castletown Road, Douglas, IM2 1HP

Telephone number: +44 7624 482126

You have the right to make a complaint at any time to the Information Commissioner, the Isle of Man supervisory authority for data protection issues ([www.inforights.im](http://www.inforights.im)) or via post at The Information Commissioner First Floor, Prospect House Prospect Hill Douglas Isle of Man IM1 1ET.

We would, however, appreciate the chance to deal with your concerns before you approach the Information Commissioner so please contact us in the first instance.

## THE TYPES OF INFORMATION, INCLUDING PERSONAL INFORMATION, WE MAY COLLECT

We collect your personal information when you provide it to us. "Personal Information" is any information that can be used to identify you or that we can link to you as an individual and may include:

- Full name
- Company or organisation details.
- Contact information including postal address, email address and telephone number(s).
- Demographic information such as postcode, preferences and interests.
- Information we collect automatically through cookies and similar tracking technologies through our website, mobile applications or other online services.
- Please refer to our online services privacy policy for further details copy on request.

We may also collect, store and use the following "special categories" of more sensitive personal information including:

- Racial or ethnic origin.



The image shows a promotional graphic for Carol Glover Coaching. On the left, the name 'Carol Glover' is written in a large, teal, cursive font. Below it, the tagline 'THE MAVERICK MAKER' is written in white capital letters on a black rectangular background. Underneath the tagline, contact information is listed: 'W: carolglovercoaching.com', 'E: carol@carolglovercoaching.com', and 'M: (+44) 7577 635142 & IOM (+44) 7624 482126'. At the bottom left, there is small text: 'Dancing Spirit Bear is registered in the Isle of Man, Company Number 331452C. Address: Rosemanly New Castletown Road, Douglas, IM2 1HP. Directors: Carol Glover and Peter Glover'. On the right side of the graphic, there is a photograph of Carol Glover, a woman with short brown hair wearing a colorful patterned jacket, pointing with a white marker at a whiteboard. The whiteboard has the text 'CONNECT WITH ME:' at the top and five circular social media icons: LinkedIn, Facebook, Instagram, SoundCloud, and YouTube.

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- Political opinions, religious or philosophical beliefs.
- Trade union membership.
- Data concerning physical or mental health or disabilities.
- Genetic data or biometric data for the purpose of uniquely identifying a natural person.
- Marital or family status; or
- Data concerning a natural person's sex life or sexual orientation.

## PERSONAL INFORMATION YOU PROVIDE TO US VOLUNTARILY

We may also collect other information that you voluntarily provide to us, including when you communicate with us via email, post, telephone or other channels; when you sign up for or request marketing materials; when you submit an application for an employment position with us; when you sign up for an event; and when you respond to our communications or requests for information.

## INFORMATION WE MAY COLLECT FROM THIRD PARTY SOURCES

We may receive information about you from other sources, including third parties and publicly available information that help us: update, expand, and analyse our records; identify new customers or prevent or detect fraud. We may also receive information about you from social media platforms, including but not limited to, when you interact with us on those platforms or access our social media content. Please note that the information we may receive from those third-party sites is governed by the privacy settings, policies, and/or procedures of the applicable platform, and we strongly encourage you to review them before submitting any information to them.

## HOW WE MAY USE AND SHARE THE INFORMATION WE COLLECT

We may use the information we collect:

- To respond to your enquiries.
- To provide you with services that you request.
- To send you information or materials that may be of interest to you or which you have expressed an interest in receiving.



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- To maintain our list of contacts.
- For CGCs business purposes, including improving the provision of consultancy services, submitting invoices; detecting, preventing, and responding to actual or potential fraud, illegal activities, or intellectual property infringement.
- To assess the effectiveness of our events, promotional campaigns and publications.
- To evaluate and recruit personnel; and
- As we believe reasonably necessary or appropriate to: comply with our legal obligations; respond to legal process or requests for information issued by government authorities or other third parties; or protect your, our, or others' rights.

## HOW WE MAY SHARE THE INFORMATION WE COLLECT

CGC is a provider of Coaching and consultancy services with one office in the Isle of Man. We do not sell, rent, or otherwise share any information with unaffiliated entities except as expressly described in this Privacy Policy or with your prior permission.

We may also share information we collect with:

- Employees of CGC, but their use shall be limited to the performance of their duties and in line with the reason for processing. Our employees are required to keep that information confidential and are not permitted to use it for any purposes other than to provide consultancy services, to deal with requests which are submitted to us or for the purposes of facilitating our use of that information in accordance with this Privacy Policy;
- Third-party service providers engaged by us to perform services on our behalf, such as web-hosting companies, information technology providers, admin, marketing and communications services and event hosting services.
- Law enforcement, courts or tribunals, other government authorities, or third parties (within or outside the jurisdiction in which you reside) as may be permitted or required by the laws of any jurisdiction that may apply to us; as provided for under contract; or as we deem reasonably necessary to provide our Coaching and consultancy services. In these circumstances, we take reasonable efforts to notify you before we disclose information that may reasonably identify you or your organisation, unless giving prior notice is prohibited by applicable law or is not possible or reasonable in the circumstances; Service providers, advisors, potential transactional



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partners, or other third parties in connection with the consideration, negotiation, or completion of a transaction or service.

## LEGAL GROUNDS FOR USING PERSONAL INFORMATION

We rely on the following legal grounds to process personal information, namely:

- Consent – We may use personal information as described in this Privacy Policy subject to your consent. To withdraw your consent to such use, you can contact us via [carol@carolglvoercoaching.com](mailto:carol@carolglvoercoaching.com). Where required by applicable laws, we will rely on your consent for direct marketing and to collect information from your device or computer.
- Performance of a contract – We may need to collect and use personal information to enter a contract with you or to perform a contract that you have entered into with us. For example, when you engage CGC to provide Coaching or consultancy services we will use your personal information to respond to provide you with such services.
- Legitimate interests – We may use your personal information for our legitimate interests to provide Coaching and consultancy services and to improve our services. Consistent with our legitimate interests and any choices that we offer or consents that may be required under applicable laws, we may use personal information for our marketing purposes and other technical information as described in this Privacy Policy.

## MEASURES WE TAKE TO PROTECT AND SAFELY STORE THE INFORMATION WE COLLECT

CGC is a local provider of Coaching and consultancy services and we may store or process the information we collect in jurisdictions where we operate. The European Commission (“EC”) has deemed that the Isle of Man as a jurisdiction is considered to provide an adequate level of protection for your personal information in accordance with European Union standards.

In addition, we deploy administrative, technical, and physical safeguards designed to comply with applicable legal requirements and safeguard the information that we collect. This includes, when required or appropriate and feasible, obtaining written assurances from third parties that may access your data that they will protect the data with safeguards designed to provide a level of protection equivalent to that adopted by CGC.

However, no information system can be 100% secure. So, we cannot guarantee the absolute security of your information. Moreover, we are not responsible for the security of



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information you transmit to us over networks that we do not control, including the Internet and wireless networks.

## RETENTION OF THE INFORMATION WE COLLECT

We retain the information we collect for no longer than is reasonably necessary to fulfil the purposes for which we collect the information and to comply with our legal obligations.

## YOUR CHOICES AND RIGHTS

To withdraw your consent to the use of your information as described in the Privacy Policy you can contact us via [carol@carolglovercoaching.com](mailto:carol@carolglovercoaching.com). Please note that in some circumstances this may mean that we can no longer provide our services to you. If you no longer wish to receive marketing communications from us, you can also let us know via [carol@carolglovercoaching.com](mailto:carol@carolglovercoaching.com). The electronic marketing communications we send you also contain opt-out mechanisms that allow you to opt-out from receiving those communications, update your contact information or change your preferences at any time. We will honour your choice and refrain from sending you such announcements. You may also opt back in to receive those communications at any time.

You have several rights in relation to the information that we hold about you. These rights include:

- the right to access information we hold about you and to obtain information about how we process it.
- the right to withdraw your consent to our processing of your information, which you can do at any time. We may continue to process your information if we have another legitimate reason or legal obligation for doing so.
- in some circumstances, the right to receive certain information you have provided to us in an electronic format and/or request that we transmit it to a third party.
- the right to request that we rectify your information if it is inaccurate or incomplete.
- in some circumstances, the right to request that we erase your information. We may continue to retain your information if we are entitled or required to retain it.
- the right to request that we restrict our processing of your information in some circumstances. There may be situations where you object to, or ask us to restrict, our processing of your information but we are entitled to continue processing your information and/or to refuse that request.



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

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 may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us 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.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You can exercise your rights by contacting us using the details set out below. As an individual you also have a right to complain to the data protection regulator in the country where you live or work.

If you would like to discuss or exercise the rights you may have, you can contact us via [carol@carolglovercoaching.com](mailto:carol@carolglovercoaching.com).

## CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time and we encourage you to review this page periodically. If we make any material changes in the way we collect, use, and/or share the personal information that you have provided, we will notify you by providing an updated copy of this policy directly to you.

V1 2<sup>nd</sup> March 2020



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