

Privacy Policy

This Privacy Policy (the "Policy") relates to information which is obtained by Human Communication Ltd and for which Human Communication Ltd **is the Data Controller**. This Policy applies to any and all websites which operate under the management of Human Communication Ltd (the "Website").

Human Communication Ltd is committed to protecting your personal information and being transparent about what information we hold about you. We respect the privacy of every person who visits or registers with the Website and uses the Website's functionality.

We use your information in accordance with all applicable laws concerning the protection of personal information. This notice explains;

- What information we may collect about you
- How we may use that information
- In what situations we may disclose your details to third parties
- Information about how we keep your personal information secure, how we maintain it and your rights to be able to access it.

Who we are and what we do

The mission of Human Communication Ltd is to enable people to apply mindfulness to their personal and professional lives. Our vision is to educate others to live with greater awareness, leading to a more balanced and fulfilling life.

We do this by providing a range of sessions, interactions, courses and events both in-person and via remote communications technologies.

The personal information that we may collect

We will only collect information when you interact with us. We collect various types of information and in a number of ways.

Information you give to us directly, for example, when you register on the Website or attend events, we may store information you give us including your name, email address, postal address, telephone number. Note that we never store payment card details.

Information about your interactions with us, for example how you interact with content on our Website. We keep records of mailings we sent you and in the case of emails we also keep a record of which you have opened and which links you have clicked on.

We may collect sensitive personal data, recognised under Data Protection law as information about health. We do not usually collect this type of information unless there is a clear and specific reason for doing so, for example if we need to request health or dietary information from participants in an event.

Other information that you provide to us. For example, comments or feedback that you provide regarding our activities.

When you attend events, we may take photographs of the audience group which may include identifiable individuals. These photographs could be used for several different purposes, including marketing, reporting and archiving. We will always give notice of photography at our events and our photographers will be clearly identifiable. Photographs will not be linked to individuals by name without prior consent.

Through our use of cookies, log files and other technologies, we collect personal information and other information regarding your mobile device or the computer hardware and software used to access the Website. This may include some or all of the following;

- IP address of device(s) used
- browser type
- operating system and device type
- approximate location (e.g. London)
- access times and dates
- referring website addresses.

Why we hold and process your personal data

We only collect information that we need to carry out our business. We need personal details from you in order to fulfil our obligations to you. This includes providing you with information about our organisation, and your interaction with us on events and other programmes and may also extend to understanding how best to support you in order to participate in one of our programmes.

We need to;

- To keep a record of payments made and our communications with you
- To fulfil contractual obligations entered into with you, for example, purchase of a course or event attendance.

Our Legal basis

The basis under which we process any data can be one of three ways.

Contract Basis. When you make a purchase from us you are entering into a contract with us. In order to perform this contract we need to process and store your data. For example we may need to contact you by email or telephone in the case of changes to an event, or in the case of problems with your payment. When you enrol in any of our programmes, you are deemed to have given your explicit consent to collection of the minimum requirement of personal data necessary to complete the enrolment.

Legitimate Interest. In certain situations we collect and process your personal data for purposes that are in our legitimate organisational interests. However we only do this if there is no overriding prejudice to you by using your personal information in this way.

Consent. For any situations where the two bases above are not appropriate, we will instead ask for your explicit consent before using your personal information in that specific situation.

How we may use your personal information

Our primary goal in collecting personal information from you is to (i) verify your identity, (ii) help us improve the Website, improve our programmes and develop new ones and areas of interest, (iii) carry out requests made by you on the Website, (iv) investigate or settle inquiries or disputes, (v) comply with any applicable law, court order, other judicial process, or the requirements of a regulator, (vi) enforce our agreements with you such as our Website terms and conditions of use, (vii) protect the rights, property or safety of us or third parties, including other users of the Website, (viii) provide support and security for the Website and (ix) use as such information as otherwise required or permitted by law.

Marketing communications

We aim to communicate with you about the work that we do in ways that you find relevant, timely and respectful. To do this we use data that we have stored about you, such as what events you have booked for in the past, as well as any preferences you may have told us about.

We use our legitimate organisational interest as the legal basis for communications by email. We will give you an opportunity to opt out of receiving them at any time during your interactions with us. If you do not opt out, we will provide you with an option to unsubscribe in every marketing email that we subsequently sent you, or you can alternatively use the contact details at the end of this policy.

How we obtain your consent

When you enter a contract with us, you are deemed to have given your explicit consent to collection of the minimum requirement of personal data necessary to complete and further manage the contract.

Where our use of your personal information requires your consent, you can provide such consent;

- at the time we collect your personal information following the instructions provided; or
- by informing us by e-mail or phone using the contact details set out in this privacy policy.

Use of cookies

Cookies are small text files that are automatically placed onto your device by some websites that you visit. They are widely used to allow a website to function (for example to keep track of your basket) as well as to provide website operators with information on how a website is being used. We use cookies to keep track of any transactions with you as well as to identify how the Website is being used (navigated) and what improvements we can make. For example, changes to menus and navigation.

We may use first party (e.g. Google Analytics) and third party (e.g. Google DoubleClick) cookies to;

- Understand and save user's preferences for future visits
- Compile aggregate data about site traffic and interactions to offer better site experiences and tools in the future
- We may also use trusted third-party services that track this information on our behalf
- Help remember and process the items in any shopping cart/event registration functions.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Since each browser is a little different, look at your browser's Help Menu to learn how to modify the way it treats cookies.

If you turn cookies off, some features will be disabled that make your user experience more efficient and some features may not function properly.

Third-party disclosure

It is likely that the Website will contain links to third party websites and services. Please remember that when you use a link to go from our Website to

another website or you request a service from a third party, this privacy policy no longer applies.

Your browsing and interaction on any other website, or your dealings with any other third party service provider, is subject to that website's or third party service provider's own rules and policies. We do not monitor, control, or endorse the privacy practices of any third parties.

This privacy policy applies solely to personal information collected by us through our Website and does not apply to these third party websites or third party service providers.

There are certain circumstances under which we may disclose your personal information to third parties. These are as follows;

- to our own service providers and service partners who process data on our behalf and on our instruction. In these cases we require that these third parties comply strictly with our instructions and with data protection laws, for example around security of personal data. In these instances, this Policy is deemed to apply.
- where we are under a duty to disclose your personal information in order to comply with any legal obligation (for example to government bodies and law enforcement agencies).

Retention of personal data

We store your personal information indefinitely such that for any subsequent transactions you have with use, we are able to link them back to a single unique client record that we hold for you on our system.

If there are aspects of your record that are inaccurate or that you would like to remove, you can use the contact details at the end of this policy.

Any objections you make to any processing of your data will be stored against your record on our system so that we can comply with your requests.

Confidentiality and security of your personal information

We will put in place appropriate safeguards (both in terms of our procedures and the technology we use) to keep your personal information as secure as possible.

We will take reasonable precautions to protect your personal information from loss, misuse or alteration.

We will mandate that any third parties we use for processing your personal information do the same.

We will not transfer, process or store your data anywhere that is outside of the European Economic Area.

All our employees and data processors (i.e. those who process your personal information on our behalf) who have access to, and are associated with the processing of personal information, are obliged to respect the confidentiality of the personal information of all users of the Website.

Your rights under GDPR

You have the following rights in relation to the personal information we hold about you:

Your right of access. If you ask us, we'll confirm whether we're processing your personal information and, if required, provide you with a copy of that personal information. If you require additional copies, we may need to charge a reasonable fee.

Your right to rectification. If the personal information we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If we've shared your personal information with others, we'll let them know about the rectification where possible. If you ask us, and where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

Your right to erasure. You can ask us to delete or remove your personal information in some circumstances such as where we no longer need it or you withdraw your consent (where applicable). If we've shared your personal information with others, we'll let them know about the erasure where possible. If you ask us, and where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

Your right to restrict processing. You can ask us to 'block' or suppress the processing of your personal information in certain circumstances such as where you contest the accuracy of that personal information or object to us processing it. It won't stop us from storing your personal information though. We'll tell you before we lift any restriction. If we've shared your personal information with others, we'll let them know about the restriction where possible. If you ask us, and where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

Your right to data portability. With effect from 25 May 2018, you have the right, in certain circumstances, to obtain personal information you've provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or ask us to transfer this to a third party of your choice.

Your right to object. You can ask us to stop processing your personal information, and we will do so, if we are;

- relying on our own or someone else's legitimate interests to process your personal information except if we can demonstrate compelling legal grounds for the processing
- processing your personal information for direct marketing
- processing your personal information for research unless such processing is necessary for the performance of a task carried out in the public interest.

Your rights in relation to automated decision-making and profiling. You have the right not to be subject to a decision when it's based on automatic processing, including profiling, and it produces a legal effect or similarly significantly affects you unless such profiling is necessary for entering into, or the performance of, a contract between you and us.

Your right to withdraw consent. If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time.

Your right to lodge a complaint with the supervisory authority. If you have a concern about any aspect of our privacy practices, including the way we've handled your personal information, you can report it to the UK Information Commissioner's Office (ICO). You can find details about how to do this on the ICO website at <https://ico.org.uk/concerns/> or by calling their helpline on 0303 123 1113.

Changes to this privacy policy

To ensure that you are always aware of how we use your personal information we may update this privacy policy from time to time to reflect any changes to our use of your personal information. We may also make changes as required to comply with changes in applicable law or regulatory requirements. We may notify you by e-mail of any significant changes. However, we encourage you to review this privacy policy periodically to be informed of how we use your personal information.

Our contact details

If you have any questions about this privacy policy or want to exercise your rights, please contact us by sending an e-mail to privacy@human-communication.com or via telephone at 020-3137 1358.