

# Privacy policy

## Data Controller: Spiraldynamik® UK.

This policy is valid from 25<sup>th</sup> May 2018. We may update this privacy policy from time to time in order to reflect, for example, changes to our practices or for other operational, legal or regulatory reasons.

## How is your information collected?

Information is obtained when you:

- ▶ visit our website
- ▶ enquire about our event availability via our website's 'Contact Us' page
- ▶ book and attend workshops or courses
- ▶ provide us with a testimonial through our website or by email
- ▶ make telephone or written enquiries
- ▶ complete course feedback forms

## How is the information we collect used?

Personal data is collected for registration purposes and to contact you with course related information. We retain your details in order to inform you of future Spiraldynamik® training events, and other news.

We will not sell, rent or provide your information to any third parties for marketing purposes.

## Use of website

This section of the privacy policy describes how your personal information is collected, used, and shared when you visit or make a booking via [www.spiraldynamik.co.uk](http://www.spiraldynamik.co.uk) (the "site").

## Personal Information we collect

When you visit the site, we automatically collect certain information about your device, including information about your web browser, IP address, time zone, and some of the cookies that are installed on your device. Additionally, as you browse the site, we collect information about the individual web pages that you view, what websites or search terms referred you to the site, and information about how you interact with the site. We refer to this automatically-collected information as "device information."

We collect device information using the following technologies:

- ▶ "Cookies" are data files that are placed on your device or computer and often include an anonymous unique identifier. For more information about cookies, and how to disable cookies, visit <http://www.allaboutcookies.org>
- ▶ "Log files" track actions occurring on the site, and collect data including your IP address, browser type, internet service provider, referring/exit pages, and date/time stamps.
- ▶ "Web beacons," "tags," and "pixels" are electronic files used to record information about how you browse the site.

Additionally when you contact us through the site, we collect certain information from you, including your name, billing address, email address, and phone number. We refer to this information as "booking information."

When we talk about "personal information" in this privacy policy, we are talking both about device information and booking information.

## How do we use your personal information?

We use the booking information that we collect generally to fulfill any booking placed through the site (including invoices and/or booking confirmations). Additionally, we use this booking information as follows:

- ▶ to communicate with you.
- ▶ to provide you with information or advertising relating to our products or services (when in line with the preferences you have shared with us).
- ▶ we use the device information that we collect to help us screen for potential risk and fraud (in particular, your IP address), and more generally to improve and optimize our site (for example, by generating analytics about how our customers browse and interact with the site, and to assess the success of our marketing and advertising campaigns).

### **Sharing your personal information**

We share your personal information with third parties to help us use your personal information, as described above. We also use Google Analytics to help us understand how our customers use the site – you can read more about how Google uses your personal information here: <https://www.google.com/intl/en/policies/privacy/>  
You can also opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>

Finally, we may also share your personal information to comply with applicable laws and regulations, to respond to a subpoena, search warrant or other lawful request for information we receive, or to otherwise protect our rights.

You can opt out of some of these services by visiting the Digital Advertising Alliance’s opt-out portal at: <http://optout.aboutads.info/>

All emails and newsletters from our site allow you to opt out of further mailings.

### **Do not track**

Please note that we do not alter our site’s data collection and use practices when we see a do not track signal from your browser.

### **Your rights**

If you are a European resident, you have the right to access personal information we hold about you and to ask that your personal information be corrected, updated, or deleted. If you would like to exercise this right, please contact us through the contact information below.

Additionally, if you are a European resident we note that we are processing your information in order to fulfill contracts we might have with you (for example if you make an order through the site), or otherwise to pursue our legitimate business interests listed above. Additionally, please note that your information will be transferred outside of Europe, including to Canada and the United States.

### **Data retention**

When you request a registration form through the site, we will maintain your booking information for our records unless and until you ask us to delete this information.

### **Controlling your information**

You have certain rights concerning the information we hold about you, as defined under the General Data Protection Regulation. If you wish to exercise these rights, please contact us, with your name and email address.

#### **1. Requesting a copy of your information**

You may request a copy of any data we hold about you. Upon request, we will provide a CSV file containing the personal data we hold on record about you.

#### **2. Updating or correcting your information**

It is important that the information we hold about you is accurate. If you change email address, or any of the other information we hold is inaccurate or out of date, please contact us so that we can correct our records.

#### **3. Deleting your information**

You have the right to request erasure of your personal information. Unless there is a justifiable reason for the data not to be erased, i.e. if we needed to use that data to fulfil our contractual or legal obligations, your personal data will be deleted on request.

#### **4. Automated decision making**

We do not use any personal information for automated decision making or profiling; your data is not subject to automated decision making or profiling.

### **Use of ‘Cookies’**

Like many other websites, our website uses cookies. Cookies are small pieces of information that are stored on your computer or mobile device when you visit a website.

The following list outlines what we use cookies for:

- ▶ **Google Analytics:** Google Analytics sets cookies to help us accurately estimate the number of visitors to the website and what content is most popular. This helps to ensure that our website is responding to your needs in the best way possible.

- ▶ **Facebook:** Our website includes an embedded Facebook timeline. Facebook sets a number of cookies to facilitate this. Our website uses Facebook Pixel.

By using and browsing our website, you consent to cookies being used in accordance with this Policy. If you do not consent, you must turn off cookies or refrain from using the site. Most browsers allow you to turn off cookies. To do this, look at the 'help' menu on your browser. Switching off cookies should not noticeably restrict your use of this website.

### **Security**

We take security seriously. In order to protect your information from loss, misuse or unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect.

### **Data Breaches**

Our information security policy includes a clear process for handling a personal data breach, should one occur. Where appropriate, we will promptly notify you of any unauthorised access to your personal information.

### **Complaints**

If you wish to raise a complaint on how we have handled your personal information, you can contact us directly and we will investigate the matter.

If you are not satisfied with our response, or believe we are processing your personal information not in accordance with the law, you can complain to the [Information Commissioner's Office \(ICO\)](#).

### **Contact Us**

For more information about our privacy practices, if you have questions, or if you would like to make a complaint, please contact us by e-mail at: [spirdynamik.uk@spirdynamik.com](mailto:spirdynamik.uk@spirdynamik.com)