

# Terms of Service / Privacy Policy 2018

Please read this Privacy Policy carefully before using this website. Last Updated: May 2018

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The website and its content is owned by Tekla Kósa, Autogenic Therapist, Reflexologist ("Company", "we", or "us"). The term "you" refers to the user or viewer of *www.teklakosa.com* ("Website").

## INTRODUCTION

This privacy notice provides you with details of how we collect and process information, including Personal Data (as defined below) through your use of our site including any information you may provide through our site when you purchase a product or service, sign up to our newsletter or take part in a prize draw or competition.

By providing us with your data, you warrant to us that you are over 13 years of age.

We will not use or share your information with anyone except as described in this Privacy Policy. The use of information collected through our Website shall be limited to the purposes under this Privacy Policy and our Terms of Use for customers.

Please read this Privacy Policy carefully. We reserve the right to change this Privacy Policy on the Website at any time without notice. In the event of a material change, we will let you know via email and / or a prominent notice on our Website.

Use of any personal information or contribution that you provide to us, or which is collected by us on or through our Website or its content is governed by this Privacy Policy. By using our Website or its content, you consent to this Privacy Policy, whether or not you have read it.

# WHAT DATA DO WE COLLECT ABOUT YOU

We collect personal information from you so that we can provide you with a positive experience when utilizing our Website or content. We will only collect the minimum amount of information necessary for us to fulfil our obligation to you.

We may process certain types of personal data about you as follows:

 Identity Data (first name, maiden name, last name, username) and Contact Data (your delivery address, email address and telephone numbers) so we can deliver our newsletter to



you – you would be affirmatively consenting to this by providing this to us in our contact forms.

- Financial Data (name, billing address and credit card information) so that we can process payment to deliver our products or services to you under our contractual obligation.
- Marketing and communications Data may include your preferences in receiving marketing communications from us us and our third parties and your communication preferences.

Please note that the information above ("Personal Data") that you are giving to us is voluntarily, and by you providing this information to us you are giving consent for us to use, collect and process this Personal Data. You are welcome to opt-out or request for us to delete your Personal Data at any point by contacting us at info@teklakosa.com.

If you choose not to provide us with certain Personal Data, you may not be able to participate in certain aspects of our Website or content.

## **Other Information We May Collect**

## Anonymous Data Collection and Use

To maintain our Website's high quality, we may use your IP address to help diagnose problems with our server and to administer the Website by identifying which areas of the Website are most heavily used, and to display content according to your preferences. Your IP address is the number assigned to computers connected to the Internet. This is essentially "traffic data" which cannot personally identify you, but is helpful to us for marketing purposes and for improving our services. Traffic data collection does not follow a user's activities on any other websites in any way.

#### Use of "Cookies"

We may use the standard "cookies" feature of major web browsers. We do not set any personally identifiable information in cookies, nor do we employ any data-capture mechanisms on our Website other than cookies. You may choose to disable cookies through your own web browser's settings. However, disabling this function may diminish your experience on our Website and some features may not work as intended.

#### HOW WE COLLECT YOUR PERSONAL DATA

We collect data about you through direct interactions: You may provide data by filling in forms on our site (or otherwise) or by communicating with us by post, phone, email or otherwise, including when you:

- Order our products or services;
- Subscribe to our service or publications;
- Request resources or marketing be sent to you;
- Enter a competition, prize draw, promotion or survey; or



• Give us feedback.

## HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when legally permitted. The most common uses of your personal data are:

- Where we need to perform the contract between us.
- 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 or regulatory obligation.

Generally, we do not rely on consent as a legal ground for processing your personal data, other than in relation to sending marketing communications to you via email. You have the right to withdraw consent to marketing at any time by emailing us at <u>info@teklakosa.com</u>.

## Purposes for processing your personal data

#### **Contact You**

We may contact you with information that you provide to us based on these lawful grounds for processing:

- 1. We may contact you if you give us your clear, unambiguous, affirmative consent to contact you.
- 2. We will contact you under our contractual obligation to deliver goods or services you purchase from us.
- 3. We may contact you if we feel you have a legitimate interest in hearing from us. For example, if you sign up for a webinar or online course, we may send you marketing emails based on the content of that webinar. You will always have the option to opt out of any of our emails.

#### **Process Payments**

We will use the Personal Data you give to us in order to process your payment for the purchase of goods or services under a contract. We only use third party payment processors that take the utmost care in securing data and comply with the GDPR.

#### Viewing by Others

Note that whenever you voluntarily make your Personal Data available for viewing by others online through this Website or its content, it may be seen, collected and used by others, and therefore, we cannot be responsible for any unauthorized or improper use of the information that you voluntarily share (i.e., sharing a comment on a blog post, posting in a Facebook group that we manage, sharing details on a group coaching call, etc.).



## Submission, Storage, Sharing and Transferring of Personal Data

Personal Data that you provide to us is stored internally or through a data management system. Your Personal Data will only be accessed by those who help to obtain, manage or store that information, or who have a legitimate need to know such Personal Data (i.e., our hosting provider, newsletter provider, payment processors or team members).

## **Data Retention**

We retain your Personal Data for the minimum amount of time necessary to provide you with the information and / or services that you requested from us. We may include certain Personal Data for longer periods of time if necessary for legal, contractual and accounting obligations.

## Confidentiality

We aim to keep the Personal Data that you share with us confidential. Please note that we may disclose such information if required to do so by law or in the good-faith belief that: (1) such action is necessary to protect and defend our rights or property or those of our users or licensees, (2) to act as immediately necessary in order to protect the personal safety or rights of our users or the public, or (3) to investigate or respond to any real or perceived violation of this Privacy Policy or of our Disclaimer, Terms and Conditions, or any other terms of use or agreement with us.

## YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- 1. Request information about how your Personal Data is being used and request a copy of what Personal Data we use.
- Restrict processing if you think the Personal Data is not accurate, unlawful, or no longer needed.
- 3. Rectify or erase Personal Data and receive confirmation of the rectification or erasure. (You have the "right to be forgotten").
- 4. Withdraw your consent at any time to the processing of your Personal Data.
- 5. Lodge a complaint with a supervisory authority if you feel we are using your Personal Data unlawfully.
- Receive Personal Data portability and transference to another controller without our hinderance.
- 7. Object to our use of your Personal Data.
- 8. Not be subject to an automated decision based solely on automatic processing, including profiling, which legally or significantly affects you.



#### Unsubscribe

You may unsubscribe from our e-newsletters or updates at any time through the unsubscribe link at the footer of all email communications. If you have questions or are experiencing problems unsubscribing, please contact us at info@teklakosa.com.

## Anti-Spam Policy

We have a no spam policy and provide you with the ability to opt-out of our communications by selecting the unsubscribe link at the footer of all e-mails. We will not sell, rent or share your email address.

## Third Party Websites

We may link to other websites on our Website. We have no responsibility or liability for the content and activities of any other individual, company or entity whose website or materials may be linked to our Website or its content, and thus we cannot be held liable for the privacy of the information on their website or that you voluntarily share with their website. Please review their privacy policies for guidelines as to how they respectively store, use and protect the privacy of your Personal Data.

## **Notification of Changes**

We may use your Personal Data, such as your contact information, to inform you of changes to the Website or its content, or, if requested, to send you additional information about us. We reserve the right, at our sole discretion, to change, modify or otherwise alter our Website, its content and this Privacy Policy at any time. Such changes and/or modifications shall become effective immediately upon posting our updated Privacy Policy. Please review this Privacy Policy periodically. Continued use of any of information obtained through or on the Website or its content following the posting of changes and/or modifications constituted acceptance of the revised Privacy Policy. Should there be a material change to our Privacy Policy, we will contact you via email or by a prominent note on our Website.

#### **Data Controller and Processors**

We are the data controllers as we are collecting and using your Personal Data. We use trusted third parties as our data processors for technical and organizational purposes, including for payments and email marketing. We use reasonable efforts to make sure our data processors are GDPR- compliant. If you have any questions about this Privacy Policy, please contact us at info@teklakosa.com.