

Privacy Policy

Your Privacy is important to us and EmPowerMind Evolved Ltd (“EmPowerMind”, “the Company”, “we”, “our” or “us”) is committed to protecting your privacy whilst providing a personalised and valuable service.

EmPowerMind operates empowermind.co.uk (referred to as “Website” or “Site”) and any associated applications operated by EmPowerMind. Any reference to EmPowerMind includes EmPowerMind’s affiliates and other authorised representatives.

This Privacy Policy governs our data collection, processing, and usage practices. It is designed to allow the data subject (“you” or “User”) to make an informed choice regarding use, access, and correction of your Personal Information.

The processing of personal data, such as the name, address, e-mail address, or telephone number of a data subject shall always be in line with the General Data Protection Regulation (GDPR), and in accordance with the country-specific data protection regulations applicable to EmPowerMind. By means of this data protection declaration, we would like to inform the general public of the nature, scope, and purpose of the personal data we collect, use and process. Furthermore, data subjects are informed, by means of this data protection declaration, of the rights to which they are entitled.

As the controller, EmPowerMind has implemented numerous technical and organisational measures to ensure the most complete protection of personal data processed through this website. However, Internet-based data transmissions may in principle have security gaps, so absolute protection may not be guaranteed. For this reason, every data subject is free to transfer personal data to us via alternative means, e.g., by telephone.

PLEASE READ THIS PRIVACY POLICY CAREFULLY BEFORE USING THE WEBSITE.

By accessing and using the Website, you agree that you have read and agree to be bound by this Privacy Policy. If you do not agree to this Privacy Policy, please do not use the Website. Any reference to Website in this Privacy Policy shall also mean the products, services, features, and content offered on or through the EmPowerMind Website.

Definitions

The data protection declaration of EmPowerMind is based on the terms used under the General Data Protection Regulation (GDPR) and United Kingdom's UK GDPR (UK GDPR). Our data protection declaration should be legible and understandable for the general public, as well as our customers and business partners.

To ensure this, we would like to first explain the terminology used. In this data protection declaration, we use, inter alia, the following terms:

a. Personal data

Personal data means any information relating to an identified or identifiable natural person (data subject). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

b. Data subject

Data subject is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

c. Processing

Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection,

recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

d. Restriction of processing

Restriction of processing is the marking of stored personal data with the aim of limiting their processing in the future.

e. Controller or controller responsible for the processing

Controller or controller responsible for the processing is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

f. Third party

Third party is a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

g. Consent

Consent of the data subject is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

Personal Data That We Collect

In addition to collecting information that is directly submitted by you on Website, we may collect information using other methods such as by using cookies, local shared objects and similar technologies. Additionally, we may utilise a third-party vendor on our behalf to perform these collection practices.

Information That You Specifically Give Us

We may request, collect, or process the following information:

- **Account Details** - username, password, profile picture.
- **Contact Details** - email address, phone number.
- **Location Details** - physical address, billing address, time zone.
- **Identity Details** - full name, proof of identity (e.g., drivers' licence, passport), proof of address (e.g., utility bill), photograph of the user.
- **Financial Information** - credit card details, wire transfer details, payment processor details (e.g., Skrill, PayPal), tax numbers.

Information That We Collect from Others

Users can give permission for us to connect to their account on other platforms to collect personal information. This includes but is not limited to Facebook, LinkedIn, and Google. Information collected will be governed by this Privacy Policy. Users can stop us from collecting data from other platforms by removing our access on the other platform or by contacting us.

Your payment provider may transmit information about the payment that we may collect or process. In some situations, personal information of users may be collected from public sources.

We may collect or process the following information:

- **Basic Details** - Username, Profile Picture.
- **Contact Details** - Email address, Phone Number.
- **Location Details** - Physical Address, Billing Address, Time zone.
- **Financial Information** - Payment Account Details (e.g., PayPal email address and physical address), and Wire Transfer Details.

Information We Collect As You Use Our Service

We maintain records of the interactions we have with our users, including services and customer support we have provided. This includes the interactions our users have with our platform such as when a user has viewed a page or clicked a button.

In order to provide services, we may passively collect your GPS coordinates, where available from your device. Most modern devices such as smartphones will display a permission request when our platform requests this data.

When we are contacted, we may collect personal information that is intrinsic to the communication. For example, if we are contacted via email, we will collect the email address used.

We may collect or process the following information:

- **Metadata** - IP address, computer, and connection information, referring web page, standard web log information, language settings, time zone, etc.
- **Device Information** - device identifier, device type, device plugins, hardware capabilities, etc.
- **Location** - GPS position.
- **Actions** - pages viewed, buttons clicked, time spent viewing, search keywords, etc

Information Related To Children

Unless otherwise permitted by applicable law, we do not collect any personal identifiable information from children without consent from their parents, legal guardian, or school, as applicable. If you are a parent or legal guardian of a child who would like to use the Website, we may ask for your full name, birthdate, and email address in order to obtain your consent to collect your child's information including schooling details or academic year of your child, create an account for your child, and directly notify and communicate with you regarding such. We will only collect personally identifiable information from your child as is reasonably necessary to provide them access to the Website, if any.

How We Use Your Personal Data

Data collected on our Site will only be used for the purposes specified in this Privacy Policy or indicated on the relevant pages of our Site. We will not use your data beyond what we disclose in this Privacy Policy. We do not sell or lease any personally identifiable information, including financial and billing information, to third parties for purposes of marketing or solicitation without your consent. The legal basis for our data processing includes fulfilling our contractual obligations towards you, your lawful consent, protecting our or a third-party's legitimate interests, fulfilling our legal obligations, the protection of public interest, protection of vital interests, which are lawful grounds of processing under UK GDPR.

General Use

We use the Personal Information we maintain about you, and other information we obtain from your current and past activities on the Site to: (1) provide service in relation to the use of the Site including booking tutoring appointments; (2) manage your account and provide you with customer support; (3) communicate with you by email, postal mail, telephone and/or mobile devices about services that may be of interest to you either from us, our affiliates or other third parties; (4) develop and display content and tailored to your interests on the Site; (5) troubleshoot website issues or respond to your enquiries; (6) measure customer interest in the services; (7) inform you of updates; (8) customise your experience; (9) detect and protect you and us against error, fraud and other criminal activity; (10) enforce our Privacy Policy; and (11) do as otherwise described to you at the time of collection.

We may compare and review your Personal Information for accuracy and to detect errors and omissions. We may use your transaction and payment information to process payment for any purchases made on the Site, enrol you in any discount, rebate, or other program in which you elect to participate, protect against or identify possible fraudulent transactions and do as otherwise need to manage our platform.

As Data Controller:

We use the information we collect only in compliance with this Privacy Policy. We will never sell your Personal Information to any third party without your explicit consent. In addition to the uses identified elsewhere in this Privacy Policy, we may use your Personal Information to:

- a. assist you with booking requests, scheduling tutoring sessions, or any services offered on the Site;
- b. send information to you which we think may be of interest to you by post, email, or other means;
- c. send you marketing communications relating to our services; (including any profiling we engage in that is related to such direct marketing);
- d. responding to an enquiry, questions or concern that you may have raised;
- e. performing analytics and creating a database to improve your browsing experience and enhancing functionality of our services.

We may share Personal Information with trusted service providers or our affiliates for payment processing, supplementing the information you provide us in order to provide you with better service, perform statistical analysis, provide marketing assistance, hosting the site and indexing user profile pages and usernames as part of the URL and customer support. Such third parties are prohibited from using your Personal Information except for these purposes, and they are required to maintain the confidentiality of your information.

If you do not want us to share your personal information with these service providers, contact us at graeme@empowermind.co.uk.

International Data Transfer

Some of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

How Long Do We Keep Your Personal Data

The personal data of the person concerned will be deleted or made unavailable as soon as the purpose of the storage does no longer apply, unless there is a need to continue storing the data for the purpose of concluding or fulfilling a contract. Furthermore, data may be stored if this has been provided for by the European or national legislator in EU regulations, laws or other regulations to which the person responsible is subject. Personal Data in relation to those that enquire about the services which we can provide we would not normally keep that information for longer than 12 months after the last communication from the enquirer.

In case of a consent, you have the right to revoke such consent at any time, without affecting the lawfulness of the processing carried out on the basis of the consent until revocation. This has been addressed below.

Your Rights In Relation To The Information Held In Relation To You Or Your Children

You have certain rights under UK GDPR:

Access – The right to make what is known as a Subject Access Request to either a copy of the personal information which we hold about you or your children. If you make such a request we are required, in most circumstances, to provide a copy of the personal information without charge and within 30 days. You may also seek confirmation of the personal information that EmPowerMind holds about either you or your children.

Correction – It is important that You keep us up to date with any changes to the personal information provided. Subject to that You have the right to ask us, as appropriate, to correct or complete any inaccurate or incomplete data held about You or your children. Evidence may be required of the new information provided.

Erasure – You are entitled to ask us to delete or remove personal information held where there is no good reason for us to continue to hold it. It may not always be possible to comply with your request due to ongoing obligations in relation to the personal information. If this is the case, You will be made aware of it and informed of the reasons why it is not possible to fulfil the request.

Object to processing – You have the right to object to processing if we are using legitimate interests as our lawful basis for processing. There are some circumstances in which it will not be possible to comply with your request, for example if it is necessary to process the information in connection with obligations which EmPowerMind (as appropriate) have, and which have been explained to you in this document.

Restriction of processing – you may ask EmPowerMind to suspend processing of personal information in the following situations:

- If you want the data accuracy to be established;
- Where the use of the personal information is unlawful, but you do not want it to be erased;

- You need the data to be held even though EmPowerMind (as appropriate) no longer require it as you need it to establish, exercise, or defend legal claims; or
- You have objected to the use of the data by EmPowerMind, but EmPowerMind (as appropriate) needs time to determine whether they have overriding legitimate grounds to process it.

Data Portability – This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another or give it to you. The right only applies if we are processing information based on your consent or as part of a contract, or in talks about entering into a contract and the processing is automated.

Withdraw Consent - You can withdraw your consent that you have previously given to one or more specified purposes to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent. It may mean we are not able to provide certain products or services to you and we will advise you if this is the case.

To exercise your rights, please contact us, for example by e-mail or by post through details provided in “Contact Us”.

How Do We Keep Your Information Safe

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. In addition, we limit access to your personal data to those employees, 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 any applicable regulator of a breach where we are legally required to do so.

Where Can You Complain

You have the right to make a complaint at any time to the concerned supervisory authority for data protection issues.

For the UK the contact details are:

Information Commissioner's Office

Telephone: 0303 123 1113

Website: <https://ico.org.uk/concerns/>

Email: icocasework@ico.org.uk.

Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

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

Contact Us

If you have any questions about this privacy policy or the data we hold about you or you wish to ensure that the data we hold about you is accurate and kept up to date, please do not hesitate to contact us at graeme@empowermind.co.uk.

Cookie Policy

Use of Cookies

“Cookies” are pieces of information that a website transfers to your computer’s hard disk for record-keeping purposes. The use of cookies is an industry standard to provide useful features for customers. Cookies do not personally identify users, although they do identify a user’s computer. Most web browsers automatically accept cookies, but you can adapt your browser to prevent this. However, you may not be able to take full advantage of our website if you do so.

Which Cookies are used on this website?

Strictly necessary cookies

These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the site will not then work. These cookies do not store any personally identifiable information.

Performance Cookies.

These cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don’t collect information which identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. They are only used to improve how a website works.

Functionality cookies

These cookies allow a website to remember choices you make such as text size, fonts and other parts of web pages that you can customise. These cookies cannot track your browsing activity on other websites

Targeting Cookies

These cookies may be set through our site by our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant adverts on other sites. They do not store directly personal information but are based on uniquely identifying your browser and internet device. If you do not allow these cookies, you will experience less targeted advertising.

How to control and delete cookies

You may restrict or block the cookies which are set by us, or the services we use, by referring to the 'Help' option on the menu bar of your browser. This will tell you how to prevent your browser from accepting new cookies; notify you when you receive new cookies; and disable cookies altogether.

To find out more about cookies and how to manage them, visit www.aboutcookies.org.