

PRIVACY NOTICE

We are committed to protecting and respecting your privacy.

This notice (together with any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

We, us and our refer to Clever Psychology and Nutrition LLP. We are registered in England with Companies House number OC414325. Our registered office is at 36 Queensway, London, W2 3RX.

We operate the following websites: www.clever-psy.com

Our Data Protection Officer is Aleksandra Kupavskaya who can be contacted by email at info@clever-psy.com, or by post at 36 Queensway, London, W2 3RX.

Information you give us

This is information about you that you give us by filling in forms on our site or by corresponding with us by e-mail, phone or otherwise. It includes information you provide when you:

- use our site;
- subscribe to any services offered by us or register for our events; and/or
- register to receive our downloadable information, newsletters or other information.

The information you give us may include your name, email, phone number, address and date of birth. Unless otherwise agreed with you we will only collect this basic personal data about you which does not include any special categories of personal information.

Information we collect about you

With regard to each of your visits to our site we will automatically collect the following information:

- data on how you use the website such as your URL clickstreams (the path you take through the website), goods/services viewed, page response times, download errors, how long you stay on webpages, what you do on those pages, how often, and other actions;
- data that identifies you such as your IP address, login information, browser type and version, time zone setting, browser plug-in types, operating system and version.

Cookies

Our website use cookies to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

You may turn off cookies in your browser via settings. You can block cookies on your browser refusing cookies. You may delete cookies. If you turn it off, you can continue to use the website and browse its pages, but the website and certain services will not work properly.

Purpose for processing your information

We need to know basic personal information in order to provide you with the services that you have engaged us to provide and to assert our right to be compensated in return for those services as per the terms and conditions on our website.

Where you have given us your consent, we may send you information about other services that may be of interest to you by email or contact you by phone.

We will not use your personal data for any other purpose unless you explicitly instruct it to do so.

All the personal data we hold about you will be processed by personnel within the United Kingdom.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk.

Please be aware that your information may be stored on a cloud based system whose servers are located within and outside the European Economic Area (EEA). We only use companies with Privacy Shield Principles that ensures an organization provides adequate privacy protection under the EU data protection directive.

Personal Data that we hold

We will use this information:

- to send you any information you have requested;
- to provide you with the services you have requested;
- where you have given your agreement, to provide you with news and information which we think may be of interest to you and with information about our products and services. If you no longer wish us to use your data in this way, please let us know by contacting us at info@clever-psy.com or by selecting the unsubscribe button on our communications;
- to ensure that content from our site is presented in the most effective manner for you and for your computer;
- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your browser;
- to allow you to participate in interactive features of our services, when you choose to do so.

Legal basis for processing your information

We will not rent, swap or sell your personal information to other organisations for them to use in their own marketing activities.

The legal basis that we rely on for processing your data will depend upon the circumstances in which it is being collected and used, but will in most cases fall into one of the following categories:

- where you have provided your consent to allow us to use your data in a certain way;
- where the processing is necessary to carry out for the performance of a contract with you;
- where the processing is necessary in order for us to comply with a legal obligation; or
- where it is in our legitimate interests to perform our functions.

Sharing your information

We may disclose your personal information to third parties:

- if we or substantially all of our assets are acquired by a third party, in which case personal data held about our prospects and customers will be one of the transferred assets;
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation;
- to protect the rights, property, or safety of us, our partnership, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction; and
- if you make a claim against us (such as our legal advisors and insurance providers).

Retention of your personal data

We will only keep your personal data within the timeframes allowed by law and for so long as is necessary to comply with our legal obligations. The length of time we keep your data will depend on

the type of personal data we have collected. Please contact us at info@clever-psy.com for details of any specific retention period.

Marketing activities

Where you give us your consent, we will also use your personal data in order to send you marketing communications in connection with the following marketing activities and services:

- newsletters – to keep you up to date with our news and activities;
- offers - offers and discounts at our venues; and
- promotional information - information on our venue promotions.

You decide how you want us to contact you, whether by email or by phone or text message (SMS/MMS) and you can update your communication preferences at any time by telling us when things change. From time to time we will also send you a communication to update and refresh your communication preferences.

Your rights

At any point while we are in possession of or processing your personal data, you have the following rights:

- right of access – you have the right to request a copy of the information that we hold about you;
- right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete;
- right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records;
- right of portability – you have the right to have the data we hold about you transferred to another organisation;
- right to object – you have the right to object to certain types of processing such as direct marketing;
- right to judicial review - in the event that we refuse your request under rights of access, we will provide you with a reason as to why;
- you have the right to lodge a complaint with the Information Commissioner's Office if you have a concern about your personal data: <https://ico.org.uk/concerns/>.

You can exercise your rights at any time by contacting us at info@clever-psy.com. You may also withdraw your consent to direct marketing by clicking the unsubscribe button on any of our communications.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Changes to our privacy notice

Any changes we make to our privacy notice in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy notice.

Contact – if you have any questions, comments or requests regarding this privacy policy please contact us by email at info@clever-psy.com.

19/05/2018