

ORANGE PAPER F-2-E

PRIVACY NOTICE



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Nelleke Scholten

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INTRODUCTION

We are committed to safeguarding the privacy of our website visitors and service users.

This Notice applies where we act as a data controller concerning the personal data of our website visitors and service users; in other words, we determine the purposes and means of processing that personal data.

We use cookies on our website. We only use strictly necessary cookies for the functioning of our website.

This Privacy Notice applies to all services and publications offered and contracted by **The Unique Life Creator**.

They are published on The Unique Life Creator's website (www.theuniquelifecreator.com) and are downloadable.

They are integral parts of purchases through the website and of Service Agreements in case of specific services.

This Notice reflects the entire agreement between The Unique Life Creator and the Client and reflects a complete understanding of the parties concerning the subject matter.

This document supersedes all prior written and oral representations. This document may not be amended, altered or supplemented except in writing signed by the Mentor and the Client.

The Unique Life Creator – the Mentor

The term, hereinafter referred to as '(the) Mentor', or 'we', 'us', 'our', refers to 'The Unique Life Creator', whose registered office address is Ruimtevaart 24, 3824 MX, Amersfoort, The Netherlands.

The Mentor's number of registration in the Dutch Business Register is KvK 72913762, Amersfoort, The Netherlands.

The Client

The term '(the) Client' or 'you' refers to the *person* who acquires Mentor's services. It always concerns an individual.

A 'Business Client' is the legal entity that contracts and/or pays for Mentor's services for one of her employees or other individuals being under her care.

If these terms in both parts are not agreeable, please do not use Mentor's services. By using the services, Client agrees to all Terms and Conditions.

Privacy Notice

1. How we use your personal data

1.1 In this Section 1, we have set out:

- a. the general categories of personal data that we may process;
- b. the purposes for which we may process personal data; and
- c. the legal bases of the processing

1.2 We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.

1.3 We may process your website user account data ("**account data**"). The account data may include your name and email address. The source of the account data is you or your employer. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.

1.4 We may process the information you post for publication on our website or through our services ("**publication data**"). The publication data may be processed for the purposes of enabling such publication and administering our website and services.

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The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.

- 1.5 We may process information contained in any enquiry you submit to us regarding goods and/or services ("**enquiry data**"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant goods and/or services to you. The legal basis for this processing is the performance of a contract between you and us and/or the taking steps, at your request, to enter into such a contract.
- 1.6 We may process information relating to transactions, including purchases of goods and/or services, that you enter into with us and/or through our website ("**transaction data**"). The transaction data may include your contact details, your card details and the transaction details. The source of the transaction data is you and/or our payment services provider. The transaction data may be processed for the purpose of supplying the purchased goods and/or services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract; providing that, if you are not the person contracting with us, the legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.
- 1.7 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters.
The legal basis for this processing is our legitimate interests, namely communications with our website visitors and service users.

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- 1.8 We may process any of your personal data identified in this Notice where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 1.9 We may process any of your personal data identified in this Notice where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 1.10 In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject or in order to protect your vital interests or the vital interests of another natural person.
- 1.11 Please do not supply any other person's personal data to us unless we prompt you to do so.

2. Providing your personal data to others

- 2.1 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

- 2.2 Your personal data held in our website database will be stored on the servers of our hosting services providers.
- 2.3 We may disclose only personal data to our suppliers or subcontractors insofar as reasonably necessary for fulfilling our contract with you.
- 2.4 In addition to the specific disclosures of personal data set out in this Section 2, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

3. International transfers of your personal data

- 3.1 In this Section 3, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).
- 3.2 The hosting facilities for our website are situated in The Netherlands. The European Commission has made an "adequacy decision" with respect to the data protection laws of each of these countries. Transfers to each of these countries will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission.
- 3.3 You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

4. Retaining and deleting personal data

- 4.1 This Section 4 sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations regarding the retention and deletion of personal data.
- 4.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 4.3 We will retain your personal data as follows:
- a. usage data will be retained for a minimum period of 1 year following the date of collection and for a maximum period of 2 years following that date;
 - b. account, enquiry and transaction data will be retained for a minimum period of 10 years following the date of closure of the relevant account, and for a maximum period of according to national law;
 - c. notification data will be retained for a minimum period of 1 year following the date that we are instructed to cease sending the notifications and for a maximum period of 2 years following that date (providing that we will retain notification data insofar as necessary to fulfil any request you make to actively suppress notifications); and
- 4.4 Notwithstanding the other provisions of this Section 4, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject or to protect your vital interests or the vital interests of another natural person.

5. Your rights

5.1 In this Section 5, we have listed the rights that you have under data protection law.

5.2 Your principal rights under data protection law are:

- a. the right to access - you can ask for copies of your personal data;
- b. the right to rectification - you can ask us to rectify inaccurate personal data and to complete incomplete personal data;
- c. the right to erasure - you can ask us to erase your personal data;
- d. the right to restrict processing - you can ask users to limit the processing of your personal data;
- e. the right to object to processing - you can object to the processing of your personal data;
- f. the right to data portability - you can ask that we transfer your personal data to another organisation or to you;
- g. the right to complain to a supervisory authority - you can complain about our processing of your personal data; and
- h. the right to withdraw consent - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.

5.3 These rights are subject to certain limitations and exceptions. You can learn more about the rights of data subjects by visiting <https://gdpr.eu> and <https://ec.europa.eu/newsroom/article29/items/622227>

5.4 You may exercise any of your rights concerning your personal data by written notice to us, using the contact details set out at the end of this document Privacy Notice.

6. About cookies

- 6.1 A cookie is a file containing an identifier (a string of letters and numbers) sent by a web server to a web browser and stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 6.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 6.3 Cookies do not typically contain any information that personally identifies a user, but personal data that we store about you may be linked to the information stored in and obtained from cookies.

7. Cookies that we use

- 7.1 We use cookies for the following purposes:
- a. authentication and status - we use cookies to identify you when you visit our website and as you navigate our website, and to determine if you are logged into the website (cookies used for this purpose are: strictly necessary);
 - b. security - we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally (cookies used for this purpose are: strictly necessary);
 - c. cookie consent - we use strictly essential cookies for the good functioning of the website.

8. Cookies used by our service providers

- 8.1 Our service providers use cookies, and those cookies may be stored on your computer when you visit our website.
- 8.2 We use Google Analytics. Google Analytics gathers information about the use of our website by means of cookies. The information gathered is used to create reports about the use of our website. You can find out more about Google's use of information by visiting <https://www.google.com/policies/privacy/partners/>, and you can review Google's privacy Notice at <https://policies.google.com/privacy>.

9. Managing cookies

- 9.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser and from version to version. You can, however, obtain up-to-date information about blocking and deleting cookies via these links:
- a. <https://support.google.com/chrome/answer/95647> (Chrome);
 - b. <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
 - c. <https://help.opera.com/en/latest/security-and-privacy/> (Opera);
 - d. <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
 - e. <https://support.apple.com/en-gb/guide/safari/manage-cookies-and-website-data-sfri11471/mac> (Safari); and
 - f. <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).
- 9.2 Blocking all cookies will have a negative impact upon the usability of many websites.

9.3 If you block cookies, you will not be able to use all the features on our website.

10. Amendments

10.1 We may update this Notice by publishing a new version on our website from time to time.

10.2 You should check this page occasionally to ensure you are happy with any changes to this Notice.

11. Our details

11.1 Our website www.theuniquelifecreator.com is owned and operated by us.

11.4 You can contact us:

- a. by post to the postal address given at the end of this document;
- b. using our website contact form;
- c. by email, using the email address provided at the end of this document and on our website.

12. Data protection officer

12.1 Our data protection officer is Nelleke Scholten, owner of The Unique Life Creator.

13. Credit

13.1 This document was created using a template from Docular (<https://docular.net>).

14. Used software – data processing

Website software - Phoenix

14.1 Our website is developed with software from Phoenix. Personal data that you make available to us for the purposes of our services are shared with this party. Phoenix has access to your data in order to provide us with (technical) support; they will never use your data for any other purpose.

14.2 Phoenix is obliged, under the terms of the agreement we have concluded with them, to take appropriate security measures. These security measures consist of the application of SSL encryption and a firm password policy. Phoenix uses necessary cookies to collect technical information regarding your use of the software; no personal data is collected and/or stored. Phoenix reserves the right to share collected data within its own company in order to further improve its services.

Email – Office 365

14.3 We use the services of the Office365 email service (Outlook) for our regular business email traffic. This party has taken appropriate technical and organisational measures to prevent abuse, loss and corruption of your and our data. Office365 has no access to our mailbox and we treat all our email traffic as confidential.

Mailinglists - MailBlue

14.4 We send our email newsletters with MailBlue. MailBlue will never use your name and email address for its own purposes.

- 14.5 At the bottom of every newsletter, which is sent automatically via our website, you will see the 'unsubscribe' link. If you click this link, you will no longer receive our newsletter from our website. This can seriously reduce the functionality of our website!
- 14.6 Your personal data are securely transmitted, stored and retrieved by MailBlue. MailBlue uses necessary cookies and other Internet technologies that provide insight into whether emails are opened and read.
- 14.7 In addition, MailBlue processes information about you as a recipient and the subject line of emails to improve the quality of the service, these data are kept for 30 days.
- 14.8 MailBlue reserves the right to use your data for further improvement of its services and as part of this, to share information with third parties.

Payment Processor - Mollie

- 14.9 To handle (part of) the payments in our website, we use the platform Mollie. Mollie processes your name, address, residence details and payment information, including your bank account or credit card number.
- 14.10 Mollie has taken appropriate technical and organisational measures to protect your personal data. Mollie reserves the right to use your data to further improve its services and, in this context, to share (anonymised) data with third parties.

14.11 All the safeguards mentioned above for protecting your personal data also apply to the parts of Mollie's services for which it engages third parties.

14.12 Mollie will not retain your data any longer than is legally permitted.

Payment Processor - Paypal

14.13 To handle (part of) the payments on our website, we use the platform PayPal. PayPal processes your name, address, residence details and payment information, including your bank account or credit card number.

14.14 PayPal has taken appropriate technical and organisational measures to protect your personal data. PayPal reserves the right to use your data to improve its services further and, in this context, to share (anonymised) data with third parties.

14.15 All the safeguards mentioned above for protecting your personal data also apply to the parts of PayPal's services for which it engages third parties.

14.16 Paypal will not retain your data any longer than is legally permitted.



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PROPER CONSULTATION - AMICABLE SOLUTION

The Unique Life Creator stands for conducting its business correctly, honestly and fairly. So, let us communicate properly, prevent a legal or bureaucratic approach and search for an amicable solution in consultation with each other in case of an issue.

If you have any questions
concerning the content of
the Privacy Notice,
please get in touch!

English website

www.theuniquelifecreator.com

also for

My book: Unique Life Creator (in English)

Orange Papers

Blog

Newsfeeds via media

References

Email address

info@theuniquelifecreator.com

Visiting address

Ruimtevaart 24, 4th floor (Van der Valk – Vitaal – next to hotel)

Amersfoort (along the A1 motorway)

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