

## PRIVACY POLICY

PLEASE READ THE TERMS OF THIS POLICY CAREFULLY BEFORE USING THIS SITE

### 1. Pathfinder Partners Limited ("We") are committed to protecting and respecting your privacy.

1.1 This policy (together with our terms of website use and any other documents referred to on 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. By visiting vicyourcoach.com you are accepting and consenting to the practices described in this policy.

2. For the purposes of the Data Protection Act 1998 (the **Act**) and any relevant subsequent legislation, including the General Data Protection Act Regulations (**GDPR**) 25 May 2018, the data controller is Pathfinder Partners Limited of 7200 The Quorum, Oxford Business Park North, Garsington Road, Oxford, OX4 2JZ.

### 3. Information we collect from you

3.1 We will collect and process the following data about you:

3.1.1 **Information you give us.** This is information about you that you give us by filling in questionnaires and forms on our site vicyourcoach.com (**our site**) or by corresponding with us by e-mail or otherwise. It includes information you provide when you register to use our site, subscribe to our service, enter a competition, promotion or survey, and when you report a problem with our site. The information you give us may include your name, address, e-mail address and phone number, financial and credit card information, personal description.

3.1.2 **Information we collect about you.** With regard to each of your visits to our site we will automatically collect the following information:

3.1.2.1 technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;

3.1.2.2 Information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number.

3.1.3 **Information we receive from other sources.** This is information we receive about you if you use any of the other websites we operate or the other services we provide. We are working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies). We will notify you when we receive information about you from them and the purposes for which we intend to use that information.

#### 4. Cookies

4.1 Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy [\[LINK\]](#).

#### 5. Uses made of the information

5.1 We use information held about you in the following ways:

5.1.1 **Information you give to us.** We will use this information:

5.1.1.1 to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;

5.1.1.2 to provide you with information about other services we offer that are similar to those that you have already purchased or enquired about;

5.1.1.3 to provide you, or permit selected third parties to provide you, with information about services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer, and

where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please let us know by emailing us at [memberservices@vicyourcoach.com](mailto:memberservices@vicyourcoach.com).

5.1.1.4 to notify you about changes to our service;

5.1.1.5 to ensure that content from our site is presented in the most effective manner for you and for your computer.

**5.1.2 Information we collect about you.**

We will use this information:

5.1.2.1 to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;

5.1.2.2 to improve our site to ensure that content is presented in the most effective manner for you and for your computer;

5.1.2.3 to allow you to participate in interactive features of our service, when you choose to do so;

5.1.2.4 as part of our efforts to keep our site safe and secure;

5.1.2.5 to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;

5.1.2.6 to make suggestions and recommendations to you and other users of our site about services that may interest you or them.

**5.1.3 Information we receive from other sources.** We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

**6. Disclosure of your information**

6.1 You agree that we have the right to share your personal information with:

6.1.1 Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

6.1.2 Selected third parties including:

6.1.2.1 business partners, suppliers and for the performance of any contract we enter into with them or you;

6.1.2.2 analytics and search engine providers that assist us in the improvement and optimisation of our site;

6.1.2.3 credit reference agencies for the purpose of assessing your credit score where there is a condition of us entering into a contract with you.

## **7. We will disclose your personal information to third parties:**

7.1 In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.

7.2 If Pathfinder Partners Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.

7.3 If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of website use [\[INSERT AS LINK TO WEBSITE'S TERMS OF USE\]](#) and other agreements; or to protect the rights, property, or safety of Pathfinder Partners Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## **8. Where we store your personal data**

8.1 Where we have given you a member ID which enables you to access certain parts of our site, you are responsible for keeping this member ID confidential. We ask you not to share your member ID with anyone.

8.2 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. Once

we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## **9. Your rights**

9.1 You have the right to ask us not to process your personal data for marketing purposes.

We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by informing us by email at [memberservices@vicyourcoach.com](mailto:memberservices@vicyourcoach.com).

9.2 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.

## **10. Access to information**

10.1 The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request will be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

## **11. Changes to our privacy policy**

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

## **12. Contact**

12.1 Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [memberservices@vicyourcoach.com](mailto:memberservices@vicyourcoach.com).