

PRIVACY POLICY INTO THE MIRROR COACHING

We are Into The Mirror Coaching. We respect your privacy and private life, but sometimes we need your Personal Data. We consider **Personal Data** to be any information relating to an identified or identifiable person, in conformity with the General Data Protection Regulation (the **GDPR**).

This policy explains which Personal Data we use and why (the **Privacy Policy**). Furthermore, you will read how we store, protect and process this Personal Data.

This Privacy Policy applies to our Website <https://www.intothemirrorcoaching.com/> (the **Website**) and the services or products we provide (the **Services**). We process your Personal Data in accordance with the GDPR and all other relevant legislation and regulations in the field of protection of Personal Data, like Dutch Telecommunications Act (Telecommunicatiewet) regarding the use of cookies (the **Relevant Legislation**).

Are you under the age of 16?

If you are younger than 16 years old, you need permission from your parents or legal guardian to use our Website and Services.

Processing of Personal Data

In order to provide you with our Website and Services, we process your Personal Data.

Who is the controller of your Personal Data?

We are the controller of your Personal Data within the meaning of the Relevant Legislation. At the end of this Policy, you can find our contact details.

What Personal Data do we process, on which legal basis and for which specified purpose(s)

We need some of your Personal Data in order for you to use our Website and Services.

We are allowed to process your Personal Data, because we comply with the Relevant Legislation. We lawfully process your Personal Data because:

- Processing Personal Data is necessary in order to perform our contract;
- We have to comply with a legal obligation;
- We have legitimate interests to process your Personal Data, where we have considered these are not overridden by your rights;
- You have given us consent;
- Processing is necessary in order to protect the vital interests of you or another person, or
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.

We make sure that the processing of your Personal Data is adequate, relevant and limited to what is necessary in relation to the purpose for which the Data is processed.

In the table below you will read (1) which Personal Data we process (2) for which purpose(s) and (3) on which legal basis.

We shall only use your Personal Data for the following purposes or for compatible purposes. By doing so, we will not use your Personal Data in an unexpected manner.

(Personal) Data	Purpose(s)	Legal basis
<i>Contact Data:</i> -Company name -First and/or last name -Email address -Address -Phone number -VAT number	<i>We use these Data:</i> -To contact you -To correspond with you -For the delivery or performance of our Services to you	<i>We process these Data on the basis of:</i> -A necessity to perform the contract -Consent
<i>Payment Data:</i> -Payment Data of the paying party -Invoices	<i>We use these Data:</i> -To send invoices -To update our financial administration	-A necessity to perform the contract
<i>Content Data related to the Services:</i> -Correspondence or chat messages -Your questions about our Service -Notes of our conversations	<i>We use these Data:</i> -To provide you with an optimal service	-A necessity to perform the contract

How do we receive your Personal Data?

Personal data we receive from you:

We receive Personal Data directly from you when you e-mail us your details or complete one of our forms.

Are you obliged to share your Personal Data with us?

In some cases, the processing of your Personal Data is necessary. This is relevant, for example, when we have to process your Personal Data in order to oblige to a contract with you or to provide a service to you. Without your Personal Data, we cannot provide our Service to you.

Automated individual decision-making

We do not use automated individual decision-making.

How do we secure your Personal Data?

We do our utmost to protect your Personal Data from being lost, destroyed, abused, altered or spread by unauthorized parties. For this reason, persons who have nothing to do with your Personal Data, do not have access to them. We ensure this by taking the following measures:

- The access to the Personal Data is strictly limited to the employees on a 'need to know' basis;

How long do we store your Personal Data?

We shall not store your Personal Data longer than the period in which we need them for the aforementioned purposes. We delete the Personal Data after we no longer need them for the purpose we process them for.

With whom do we share your Personal Data?

Third parties

Sometimes we share your Personal Data with other parties, who are not processors. With these parties, we agree that they shall use your Personal Data carefully. They shall only process your Personal Data for purposes compatible or in line with the purpose for which we received the Personal Data from you. For example, if you decide to work with us, we share your Personal Data (Name and Contact Details) with the International Coaching Federation (ICF) if requested as part of an audit in service of maintaining professional accreditation.

If we have a legal obligation to share your Personal Data, we will do so. This is the case, for example, if a public authority legally requires us to share your Personal Data.

Transfer

We shall only process your Personal Data within the European Union. We shall only process your data outside the European Union if that country offers an appropriate level of protection for your Personal Data.

We shall never transfer your Personal Data to other countries or to other parties than those mentioned above.

Links

Our website may contain links to other websites. We are not responsible for the content or the privacy protection on these websites. Therefore, we advise you to always read the Privacy Policy of those websites.

Modifications to the Privacy Policy

We may modify this Privacy Policy. If we substantially modify the Privacy Policy, we shall place a notification on our Website together with the new Privacy Policy. We shall notify registered users in case of a substantial modification. If you are not a registered user, we advise you to consult the Website and this Policy regularly.

Your rights

You have the following rights:

- You can request access to your Personal Data;
- You can request us to correct, limit or delete your Personal Data. In the event of fraud, non-payment or other wrongful acts, we can store some of your Personal Data in a register or on a blacklist;
- You can request a copy of your Personal Data. We can provide this copy to third parties at your request, so you do not have to do so yourself;
- You can object to the processing of your Personal Data;
- You can file a complaint at the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) if you are of the opinion that we wrongfully process your data;
- You can always withdraw your permission to process your Personal Data. From the moment of your withdrawal, we cannot process your Personal Data anymore.

Contact

In the event that you wish to exercise these rights, or in the event of other questions or remarks regarding our Privacy Policy, you can contact us via the following contact details.

Into The Mirror Coaching
Flevoparkweg 68

1095 DJ Amsterdam

KvK 69180725

sumee@intothemirrorcoaching.com