

## **Privacy Policy for Tompimpactfactor.com**

At [Topimpactfactor.com](http://Topimpactfactor.com), we take the privacy of our members extremely seriously, meaning that anything given to us during registration is treated with the utmost care.

We make sure that any data provided is managed according to the highest levels of security.

The privacy policy you are reading is designed to make transparent how we gather, manage and shield your personal information gathered by the use of our site [Topimpactfactor.com](http://Topimpactfactor.com).

This also includes any data provided during newsletter sign up or from using our services and products.

[Topimpactfactor.com](http://Topimpactfactor.com) acts as the data controller and it is [Topimpactfactor.com](http://Topimpactfactor.com) that has the responsibility of securing your personal information, which will be referred to as 'us', 'we' or 'our' throughout the rest of this privacy policy.

We are dedicated to making sure your personal privacy remains secure and protected.

If we ask you to supply us with particular information that can identify you whilst using our site, you can rest assured that every process involving your data is performed according to the rules set down in this privacy policy.

This privacy declaration is effective as of 1st May 2020.

### **The Reason We Gather Your Information**

The information we take is so that we have the necessary information we need to send your periodic newsletter to you.

Also, we use your details to make you aware of all the latest offers and available discounts in the fastest possible way, a service we offer at no cost to you.

### **The Data We Collect**

The term 'Personal Data' refers to any information that can be used to identify you directly as an individual and does not refer to what's known as 'anonymised data', which can't be used to identify you.

We might use particular varieties of personal data that may include:

- Your first name and other identifiers that you may have provided at some time
- Your postal and email addresses, telephone numbers and any other information you have given to us for the purpose of communication
- Your profile includes information such as your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Your financial data includes information such as your bank account and payment card details. Payment information is never taken by us or transferred to us either through our website or otherwise. At the point of payment, you are transferred to a secure page on the website of PayPal or Stripe. That page may be branded to look like a page on our website, but it is not controlled by us.
- Transaction data includes details about payments or communications to and from you and information about products and services you have purchased from us.
- Online technical information such as browser type, browser version, plugins, IP address, time zone, locale and Operating System used to access our website
- What is known as 'usage data' could include data regarding the method you used to view our website and use our services and products.
- Marketing & Communications data which could include your own particular preferences in reference to what communications you receive from us and our 3rd party partners
- We might also aggregate some aspects of your personal data, but none of it will be able to be used to identify you as a person. For example, we often try and evaluate the percentage of our site visitors that use a particular feature or service. Should we link your personal data to aggregated data, it is then also deemed as personal data.

We never gather any sensitive information about you as an individual.

The term 'Sensitive Data' describes data that contains specifics of your gender, sexual orientation, philosophical or religious beliefs, ethnicity or race, memberships to trade bodies, political affiliations, biometric, genetics and health status.

We also never gather data relating to any criminal offences or convictions.

### **Information provided on the understanding that it will be shared with a third party**

Our website allows you to post information with a view to that information being read, copied, downloaded, or used by other people.

Examples include:

- posting a message on our forum or a comment on our blog
- sharing an image
- clicking on an icon next to another visitor's message to convey your agreement, disagreement or thanks

In posting personal information, it is up to you to satisfy yourself about the privacy level of every person who might use it.

We do not specifically use this information except to allow it to be displayed or shared.

We do store it, and we reserve a right to use it in the future in any way we decide.

Once your information enters the public domain, we have no control over what any individual third party may do with it. We accept no responsibility for their actions at any time.

Provided your request is reasonable and there is no legal basis for us to retain it, then at our discretion we may agree to your request to delete personal information that you have posted. You can make a request by contacting us via the contact form on [www.topimpactfactor.com/contact](http://www.topimpactfactor.com/contact) page.

If you decide not to supply us with your data when requested to do so, under the terms of the agreement between yourself and our website, we then might not be able to supply the goods or services found there.

If we are unable to supply you with the service ordered or otherwise, we will notify you in due course.

## **How We Gather your Data**

We gather information about you via a number of different methods, which may include any data taken during direct actions, such as through filling out a form, calling us by phone, emailing us or communicating with us in any other ways:

- When you subscribe to any of our publications or services
- When requesting that we send you marketing materials or other resources
- When filling out a survey, taking advantage of a promotion, giving us feedback or entering a prize draw
- Automatic interactions when using our website
- We obtain this data via the use of server logs, cookies and other, similar types of technology
- We might also receive technical data pertaining to you, should you visit any other of our partner sites that use our cookies
- We may also receive contact, personal, technical or identity data when you use 3rd party or publicly available information resources

## **Your Personal Data and How We Utilise It**

We will only ever utilise your personal information when we are legally allowed to do so.

The most frequent occasions this happens involve:

- When we need to in line with our legitimate publicised services or that of one of our 3rd party partners. Your personal consumer rights and interests don't override these interests
- When we are required to comply with a regulatory or legal obligation
- Typically speaking, we are not reliant on legal consent for the processing of your personal information, other than when we send you marketing data to you via email
- You retain the right to remove consent to the receipt of marketing at any time, which you can do by following the unsubscribe links displayed on every newsletter we send you and on other marketing materials we supply.

## **What We Use Your Data For**

When you subscribe to our newsletter, we regularly email you details about services and offers that are seen by us as appropriate.

The offers, products and services we offer include, but are not limited to:

- A range of courses
- Free Competitions
- Videos

## **Managing Your Personal Information**

You can opt to control the way your personal information is collected in the following ways:

If you are asked to enter your details into a form on our site, you should identify the box that indicates whether you do or do not want your information to be made available to anyone for the purposes of marketing.

Should you have already agreed to direct marketing from us before, you can remove your consent at any time via email.

[Topimpactfactor.com](http://Topimpactfactor.com) will never sell, rent or distribute your personal information to any 3rd party company, although we may use it to send you details of any promotions offered by 3rd parties which we feel that you might be interested in, should you agree to it.

## **The Reasons We Process Your Personal Data**

Listed below is a detailed account of the ways we may use your personal data and the legal aspects of the way we process it.

Also listed is an explanation of what our 'legitimate interests' represent.

We might process your personal information in more than one lawful way, which is determined by the purpose of the action.

If you require more detailed information about the exact legal reasons we process your personal data, please email us.

## **Marketing Materials**

You may receive marketing materials from [Topimpactfactor.com](http://Topimpactfactor.com) if:

- You have asked for information or signed up to the Newsletter
- You ticked the consent box on our website to receive information about our offers

## **Times We May Disclose Your Personal Data**

There are times when we may provide access to your personal data to our 3rd party service providers used by [Topimpactfactor.com](http://Topimpactfactor.com) and these companies include:

- HM Revenue & Customs, authorities or regulators in the UK who demand details of specific activities in certain circumstances
- Consultancy service providers we use for system administration, data and IT support
- Companies from the legal, banking and auditing sector who provide us with banking, consultancy, insurance, accounting and legal services

All of the 3rd party companies involved in the provision of services listed above and who receive your data are required to respect the sensitivity and security of this personal information and process it in line with the letter of the law.

We only permit this type of company to process your personal information for very specific reasons and in a manner compliant with our instructions.

## **International Transfers**

Nations located outside of the EEA (European Economic Area) don't always provide the same protection to personal data afforded inside it, so the transfer of personal data outside of the EEA is expressly forbidden, unless a very specific set of qualifying criteria is met.

A number of our 3rd party service providers are located outside the EEA, so when we work with them, your personal data may be transferred outside of the aforementioned EEA.

Whenever this happens, we do everything we can to ensure that a comparable level of security is used when dealing with your personal information.

We use the following safeguards with respect to data transferred outside the European Union:

- the processor is within the same corporate group as our business or organisation and abides by the same binding corporate rules regarding data processing.

□ both our organisation and the processor are public authorities between whom there is either a legally binding agreement or administrative arrangements approved by a supervisory authority in the European Union relating to protection of your information.

## **The Security of Your Data**

At [Topimpactfactor.com](http://Topimpactfactor.com), we have implemented suitable measures of security to stop your personal information from being altered, disclosed, used, lost or accessed without permission.

Amongst these measures are appropriate electronic, managerial and physical procedures to protect the data we gather online.

Also, we restrict access to your personal information to those staff, contractors, agents and other 3rd parties who have a clear need to use this data in line with the services they offer.

The processing of this information will only occur as per our specific instructions and is bound by a duty of confidentiality.

We have implemented a set of procedures to address any suspected data breach and part of the process involves notifying you and any relevant regulator where the law requires us to.

## **Other matters**

### ***Use of site by children***

We do not sell products or provide services for purchase by children, nor do we market to children.

If you are under 18, you may use our website only with consent from a parent or guardian.

### **Encryption of data sent between us**

We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us.

Whenever information is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.

### **How you can complain**

If you are not happy with our privacy policy or if you have any complaints then you should tell us by filling out the contact form on [www.topimpactfactor.com/contact](http://www.topimpactfactor.com/contact) page.

If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.

If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office (ICO). This can be done at <https://ico.org.uk/make-a-complaint/>. We would, however, appreciate the opportunity to talk to you about your concern before you approach the ICO.

### **Retention of data and retention period of personal data**

Your personal information is only retained for as long as it is needed for the reasons it was originally collected for, as well as any reasons relating to accounting, reporting and legal requirements.

In order to determine the right amount of time to retain personal information, we take into account the sensitivity, the nature, the quantity and the potential risk involved in its unauthorised disclosure or use.

We also constantly evaluate the methods we use to process your data, to ensure that they are being performed legally and in the most appropriate way.

The law requires that we retain contact, transactional and financial data relating to our customers for six years after they stop being our customers.

There are also circumstances in which you can request that your data be deleted.



We may also 'anonymise' your personal information, so that it can be used for statistical and research purposes. In this instance, the law allows us to use it indefinitely without any further notification to you.

### **Compliance with the law**

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we would like to hear from you. However, ultimately it is your choice as to whether you wish to use our website.

### **Your Rights Under Law**

In some situations, you, the consumer, have rights governed by laws relating to data protection and they include:

- To request to gain access to your personal information
- To request that your personal information be deleted
- To object to your personal information being processed
- To withdraw your consent to any use of your personal data
- To request the transferral of your personal information
- To request that your personal data be corrected

Should you wish that any of the above rights be exercised, please contact us.

There are no costs involved in invoking any of the rights displayed above, but we reserve the right to charge a reasonable fee if we believe that your request is excessive, unfounded or repetitive. In severe cases, we reserve the right to not comply with your request.

In order to confirm your identity, you may be asked specific information to determine your right to access the personal data in question or to exercise any of your consumer rights in the list above.

This is a necessary level of security to make sure that sensitive data is not disclosed to anyone who has no right to access it.

In order to resolve the query quicker, we may contact you to request further details relating to your enquiry.

We aim to respond to legitimate requests within a month, but it can sometimes take longer than this if the request is especially complex or there are numerous simultaneous

requests being made. In this scenario, we will proceed as quickly as we can and keep you notified throughout the process.

### **Affiliate and business partner information**

This is information given to us by you in your capacity as an affiliate of us or as a business partner.

It allows us to recognise visitors that you have referred to us, and to credit to you commission due for such referrals. It also includes information that allows us to transfer commission to you.

The information is not used for any other purpose.

We undertake to preserve the confidentiality of the information and of the terms of our relationship.

We expect any affiliate or partner to agree to reciprocate this policy.

### **Links to 3rd Parties**

You may find 3rd party website links on our site, to other companies we feel you may find interesting. However, the moment you leave our website to visit a 3rd party website, it is important to understand that we have no control over the site you are going to.

For this reason, we cannot be held responsible for the protection and privacy of any data given out whilst visiting these sites, as they do not fall under the governance of this privacy statement.

You should proceed carefully and check out the relevant privacy policy statement of the 3rd party website.

### **Our use of re-marketing**

Re-marketing involves placing a cookie on your computer when you browse our website in order to be able to serve you an advert for our products or services when you visit some other website.

We may use a third party to provide us with remarketing services from time to time. If so, then if you have consented to our use of cookies, you may see advertisements for our products and services on other websites.

## **The Way Cookies are Used**

The overwhelming majority of professional websites utilise cookies, which are small files your computer downloads to speed up access and improve your experience on the website in question.

These cookies can only be downloaded once you have given permission and they help with the analysis of website traffic, meaning the next time you visit said site, it loads quicker and your experience is a faster one.

Cookies allow information to be gathered in relation to your own specific set of behaviours and preferences tailoring your experience of the site to you.

[Topimpactfactor.com](http://Topimpactfactor.com) offers email subscriptions and newsletter service for which cookies are used to identify if you have priorly registered and to display specific notifications, which may only apply to either new or already subscribed users.

We utilise traffic log cookies to determine which website pages are being used and this allows us to analyse this information and optimise our website to our customers' needs.

This information is only used for purposes of statistical analysis and then the information is disposed of.

Generally speaking, cookies allow us to offer a better website experience, permitting us to see which aspects of our website you find useful and which you don't.

Cookies offer nothing by way of access to your computer or anything that can be used to identify you as an individual.

In some special circumstances, cookies may be used from other, trusted 3rd party partner websites.

When prompted to, you can either opt in or choose to decline the use of cookies.

There are some web browsers that don't ask you first, but by entering the settings, you can configure any given browser to decline cookies.

However, doing this may stop you from making full use of all the features on [Topmpactfactor.com](http://Topmpactfactor.com)

### **Complaints regarding content on our website**

Our website is a publishing medium. Anyone may register and then publish information about himself, herself or some other person.

We attempt to moderate user generated content, but we are not always able to do so as soon as that content is published.

If you complain about any of the content on our website, we shall investigate your complaint.

If we feel it is justified or if we believe the law requires us to do so, we shall remove the content while we investigate.

Free speech is a fundamental right, so we have to make a judgment as to whose right will be obstructed: yours, or that of the person who posted the content that offends you.

If we think your complaint is vexatious or without any basis, we shall not correspond with you about it.

### **Contact Us**

You can contact us by filling out the contact form on [www.topimpactfactor.com/contact](http://www.topimpactfactor.com/contact)

It is vital that the data we keep about you is up to date and accurate.

You can make us aware of any changes in your personal information by filling in [our contact form](#).