## **Privacy Policy**

The SEJ is the trading name of all of the websites below and when we refer to the SEJ we are referring to all websites, products, training, consultations, books and services offered by the SEJ.

This Privacy Policy ("Privacy Policy) applies to the websites <u>www.bedepressionfree.co.uk</u>, <u>www.thesej.co.uk</u>, <u>www.jacquelinemaryphillips.com</u> provided by The SEJ, including but not limited to the sites at websites <u>www.bedepressionfree.co.uk</u>, <u>www.thesej.co.uk</u>, <u>www.jacquelinemaryphillips.com</u> as well as to any services, and/or products offered on such website. Other websites may be added at any time. (hereafter the "Sites").

The SEJ values privacy – ours and yours. To help maintain your privacy and the security of your personal information, we communicate all of our privacy policies to The SEJ employees and agents, and volunteers, and we internally enforce privacy safeguards. Most recently we have implemented our UK DPA 2018 and UK-GDPR compliance efforts with respect to our customers in the EU.

We've developed this Privacy Policy to explain how we collect, use, disclose, transfer, and store information received from you in connection with the Sites. Before disclosing information to us, please familiarise yourself with our privacy practices so you can understand how your information may be used by The SEJ.

#### **Our Collection and Use of Information:**

The SEJ may collect information in a number of ways from users who access our Sites or services. We collect personal and non-personal information in various ways. You may provide your information to us to receive a product, service, or communication from us; we may request your information to better serve you, or we may require your information in order to be able complete a transaction (e.g. a purchase) or provide access (e.g. to a paid service).

#### **1. Collection of Personal Information**

Personal information (or "Personally Identifiable Information" or "PII") is information and data that can be used to specifically identify or contact a single person. You may be asked to provide your personal information when you contact The SEJ for any reason. The SEJ may share your personal information internally. If we do, we will use it in accordance with this Privacy Policy. We may also combine personal information with other information to help us to develop or improve our products, services, content, communications, and/or advertising, or to provide improved user experiences for you.

#### Personal information we collect

Examples of some types of personal information The SEJ may collect in connection with the Sites and how we may use it include the following:

- When you purchase, register, or log in to use products, or services, request support, register for a webinar, live workshop, or training, provide feedback on a product, or participate in a promotion, contest or online survey, or respond to an advertisement, we may collect a variety of information, including your name, mailing address, phone number, email address, contact preferences, and/or social media credentials. The SEJ does not directly collect credit card numbers in connection with the Be Depression Free, The SEJ, jacquelinemaryphillips.com or on the websites provided in connection therewith. Payments for those products/services are made through other means or sites and thus we do not collect or store credit card numbers in connection with any of those products/services that this Policy applies to.
- We may also ask for certain information only in circumstances where required by law.

How we use your personal information

- Optional Communications: The personal information we collect allows us to provide you with The SEJ's latest product announcements, helpful tips, and information, special offers, and upcoming events. If you don't want to receive these communications, or do not wish to be on our mailing list, you can optout of receiving them. Each communication will provide opt-out directions, and you can also generally opt-out via your account dashboard if you are a registered user, client, or customer. The information in connection with these optional communications and your responses help us to improve our products, services, content, and advertising.
- We also use personal information to help us develop, deliver, improve, and customize our, products, services, content, and advertising and to provide a better user experience for every user of our, products, and services.
- Important Communications: We may use your personal information to send important communications, e.g., about your purchases of, products, or services, material changes to our terms, conditions, and policies (including this Privacy Policy), or changes (including regulatory changes) that impact your use of The SEJ, products, or services. As this information is vital to your interaction with The SEJ, you may NOT opt-out of receiving these communications if you wish to continue to use the Sites or any, products, or services offered in connection with the Sites.
- We may also use personal information for internal purposes such as auditing, data analysis, and research to improve The SEJ's products, services, communications, support and/or help functions, and user interfaces.
- If you enter into a promotion such as a contest, a giveaway, a one-time or special offer, or similar promotion, we may use the information you provide to administer those programs.
- If we become involved in a legal process as a result of your actions on the Sites, or in connection with any, products, or services offered via the Sites, we may be required to disclose your PII or PIFI to a government authority, or a third party who e.g., issues legal proceedings that require us to provide it. Our response(s) to any such legal process will be handled on a case-by-case basis following the advice of our attorneys.

## UK DPA 2018

CONSENT: The SEJ will continue to respect and value privacy and will adhere to the regulations laid out in the UK DPA 2018. To the extent commercially practicable, and in accordance with legal or regulatory requirements we obtain your clear, informed consent before collecting your personal data. We will also always work to balance obtaining clear consent by providing useful and powerful platforms and convenient and graceful user interfaces.

## 2. Collection of Non-Personal Information

Information of a type or in a form that does not permit direct identification of or association with any specific individual is 'non-personal information.' Combinations of personal and non-personal information are considered personal information if the combined information can be used to identify or contact any specific individual(s). Aggregated data is considered non-personal information for the purposes of this Privacy Policy as long as it cannot be used to identify or contact any specific individual. Internet Protocol (IP) addresses and certain other identifiers may be considered personal information under various local laws; we endeavour to comply with the laws and regulations that are applicable to us.

How we collect and use your non-personal information We may collect, use, transfer, and disclose non-personal information for any purpose. The following are some examples of non-personal information that we collect and how we may use it:

- We may collect non-personal information (e.g., demographic information) regarding our customers collectively including information such as age, gender, occupation, preferred language, zip code, area code, geographic location, or the time zone from which customers access the Sites, products, or services. Such non-personal information is used so that we can better understand who our customers are, and their behaviour generally with regards to the Sites, and to improve our products, services, communications, support, help, user experiences, and advertising for our customers.
- We also may collect non-personal information regarding customer activities on the Sites or use of the The SEJ, products, and services. This information is aggregated and used to help us provide more useful information to our customers and to understand which parts of the Sites, or our, products, and services are of most interest or which can be improved. Non-personal support or help request data may be used to improve our or the Sites, communications, and user interfaces, or to allow us to provide additional product or service offerings to our present or future customers.
- We may collect non-personal information regarding the digital footprints of our customers with respect to accessing the Sites, or any related, products, or services including mobile and non-mobile access, specific types of devices being used, unique device IDs, type of browser(s) being used, networks that our customers use, and other non-personal information. This information may be used to improve the Sites, , products, or services including but not limited to their performance, functionality, design, or responsiveness.

## 3. Cookies and Other Technologies

To help The SEJ serve you better, we use technological means to better understand and adapt to user behaviour. To accomplish this, the Sites, as well as our online and services, email messages, and advertisements may use cookies or related technology such as pixel tags, clear gifs, and web beacons. These technologies help us to know which parts of the Sites people have visited and provide data to aid us in understanding the effectiveness of the services, our advertisements, and web searches. These data are used to improve our, products, services, communications, and advertisements. We generally consider such information collected through the use of cookies and other technologies as non-personal information and treat it accordingly.

We also use cookies and other technologies to remember personal information when you use the Sites, products, or services. These uses are intended to improve your personal experience. For example, we can provide better and more personal results if we 'remember' your preferred settings, your name, and such.

The SEJ may use cookies or other technologies in connection with certain advertising services to determine your experience with our content including whether an ad is likely to be of interest to you, whether or not you are served a particular ad and the number of times you are served a particular ad. These technologies allow us to measure the effectiveness of our ad campaigns. You may have options for opting out of such targeted ads. You should contact your service provider or your mobile provider to inquire about how to do so.

The SJ also uses specific technologies in connection with certain communications such as emails that may be used to track actions by recipients. For example, these communications may include one or more clickable text or graphics that include URLs that link to content on the Sites. However, these URLs may pass through a web server that tracks the click before arriving at the linked content on the Sites. The tracked data can help The SEJ determine the effectiveness of our communications to users and customers, or to gauge interest in specific topics. If you prefer not to have your responses to such communications tracked in this manner, do not click links in the email messages. Such communications may also include pixel tags that can tell us whether e.g., an email has been opened. We may use this information to throttle the number of messages sent to users or customers or to remove people who do not read or interact with our communications from one or more lists.

We also use cookies to track certain behaviours of unknown visitors on our site. E.g., if you visit our site by following a link in an email from a third party or in an advertisement from such a party, we may track that behaviour. In such cases, we may not have any personally identifying information about you at that time; however, if you later sign up for a product or service, or make a purchase, we may be able to associate your past behaviours on our sites with you thereafter.

Cookies and other technologies can generally be controlled on your devices. If you want to disable cookies and you should review your privacy or security settings. Please note that certain features of the Sites or related, products, or services may not be available if you have cookies disabled on your device. We will typically try to

warn you that a page or feature you are trying to reach will not function without cookies enabled. If you have your cookies on your device or browser disabled and are having difficulties, you may wish to enable them to see if the problem is resolved.

# 4. Log Files

As part of standard protocols, The SEJ's servers automatically gather certain information and store it in log files. This information may include date/time stamp of access, Internet Protocol (IP) address(es), device type, operating system, browser, and version, language, log-in details, Internet Service Provider (ISP), referring page, exit page, and other data.

These log files are useful for a number of purposes including helping The SEJ to maintain security, measure relative usage, understand and analyse trends regarding users, server access, load, or server problems, more effectively and efficiently administer the Sites, as well as related, products, services, or communications, and gather non-personal demographic information about our users. Consistent with the provisions of this Privacy Policy, The SEJ may use the data in its Log Files in a variety of ways useful to its business or to provide better experiences for its users and customers.

# 5. Social Media

The SEJ may collect certain information from you if you interact with us via social media such as Facebook, Twitter, LinkedIn, Google+, Instagram, and other such services. For example, you may be given the option to register for webinars, take advantage of special offers, receive mailings, newsletters or the like, via your social media account. The information we receive or collect from such social media, and our ability to collect it, may depend on the social media site, its policies, and its requirements or its technology. We may collect the information you provide from these social media interactions and may use it for various purposes to improve our services or your experience or to contact you regarding the reason you connected with us or with additional offers in the future. Of course, you have the opportunity to opt-out at any time provided we do not require a means of contacting you to fulfil your request.

YouTube, Google, and other Social Media / Media Sharing.

While using our products, we might be connecting to YouTube and/or Google services via API. By using our products, you agree to <u>YouTube Terms Of</u> <u>Service</u> and <u>Google Privacy Policy</u>. Furthermore, here's the <u>Revocation link</u> for users in Google security setting page.

You are solely responsible for accessing terms and conditions, privacy notices on all social media platforms used by the SEJ services prior to use. These include but aren't limited to – Facebook, YouTube, Instagram, Twitter, Vimeo, WhatsApp.

## **Disclosure to Third Parties**

At times The SEJ may make certain personal information available to strategic partners that work with us to provide, products, and services, or that help us serve our customers. Personal information will only be shared by The SEJ to provide or improve the Sites, and our, products, services, and advertising.

### **A. Service Providers**

To provide its various products or services, The SEJ works with third-party providers, who may be located wherever The SEJ operates, or in any other location. Such companies provide services to The SEJ. Examples may include information processing, emailing services, server hosting, transaction processing and banking services, video hosting, product/service delivery, communications, managing and enhancing customer data, providing technical support and/or customer service, and conducting customer research or satisfaction surveys. At any given time, The SEJ may work with one or more such providers. We will only provide personal information to these companies where required for them to provide their services, or to improve our products or services for our customers. These companies are contractually obligated to protect your information.

#### **B. Others**

The SEJ will not share PII with third parties for their marketing purposes. In some cases, The SEJ may be required by legal process to disclose your personal information. Such disclosure may be compelled by applicable law, regulation, judicial order, and/or lawful requests from local authorities. The SEJ may also disclose information about you if we determine, in our sole discretion, that disclosure is necessary or appropriate to ensure the safety of any individual(s), or for purposes of national security, law enforcement, or other issues of public importance.

If the Sites and/or, products, or services, or The SEJ becomes the subject of a reorganisation under the bankruptcy law, a merger, a sale, or other change in control, any and all personal information in The SEJ control will be transferred to the trustee, debtor in possession, successor, acquirer, or such other third party as will control The SEJ, the Sites, and/or, products, or services thereafter.

We reserve the right to disclose personal information if we reasonably believe that disclosure is necessary to protect our users, customers, or the public, prevent fraud or financial wrongdoing, or in any action to enforce our Terms, and Conditions, or other policies regarding The SEJ

#### **UK DPA 2018 Perspective**

DISCLOSURE and USE: The SEJ will let users know to whom we are disclosing personal information, and how it is being used. Of course, you should already know that we only use personal information to provide the services that you want. We are in the business of providing industry-leading platforms and will continue to do just that.

## **Personal Information Protection**

The SEJ uses commercially reasonable security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. We restrict access of personal information to our employees, contractors, and/or agents who need to know that information in order to process it on our behalf. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution if they fail to meet these obligations. The SEJ and its third-party providers use Secure Sockets Layer (SSL) encryption on all web pages where personal information, including financial information, is transmitted.

You are solely responsible for any personal information you choose to submit on non-secure sites including but not limited to any discussion forums or public comment threads on the Sites, or any social media sites, groups, or threads related to the Sites or the related, products, or services.

## **Access to Your Personal Information**

The SEJ customers should periodically log in to review your name, contact information and other readily available personal information, and to ensure they are accurate, complete, and up to date. You can make changes to your information.

You can request access to any personal information we have for you. We will make a good faith effort to provide you with access to reasonably accessible information. You can request that we correct the data if it is inaccurate or delete your personal data. The SEJ will comply with such requests if they are reasonable, and we will delete your data if The SEJ is not required to retain it by law and does not require it for legitimate business purposes. We may reserve the right to refuse deletion requests that we believe require undue time, or technical effort, or where not provided by local law. We also reserve the right to deny or delay requests where the personal information is scheduled to be deleted as part of any upcoming purge of data that is not being retained. Requests for access, correction, or deletion can be submitted to <u>enquiries@thesej.co.uk</u>

#### **UK DPA 2018 Perspective**

The RIGHT to KNOW and the RIGHT to BE FORGOTTEN: The UK DPA 2018 gives you these rights and The SEJ has worked to provide state of the art tools to enable every user to know what we know and to ask us to 'forget' them. Of course, we think it would be foolish since you would no longer be able to use our platforms, but the UK DPA 2018 gives you that right as well.

#### Links to Third-Party Sites

The Sites, products, services, and communications may contain links to third-party websites, products, or services. Information collected by third parties is governed by their privacy practices, not this Privacy Policy. Please be aware when you leave the

Sites and understand that you are subject to a third party's privacy policy except when you are on the Sites or using The SEJ's related products, or services.

### **EUROPEAN UNION Users: The UK-GDPR**

On or before May 25th, 2018 The SEJ was a fully compliant Processor of Personal Data under the GDPR. If you have any questions with regard to your EU customer's data, feel free to contact us at enquires@thesej.co.uk

The SEJ is now compliant with UK DPA 2018

#### Changes to this Privacy Policy and Privacy Questions

If you have any questions or concerns about this Privacy Policy, please email us at enquiries@thesej.co.uk

This Privacy Policy is subject to change from time to time at The SEJ's sole discretion. Please check this page periodically for changes. Any such changes to the Privacy Policy will be available on this page. If the policy has been changed in a material way, a notice will be posted on our website along with a link to the updated Privacy Policy. Your continued use of our site following the posting of changes to these terms will mean you accept the changes. Information collected prior to the time any change is posted will be used according to the rules and laws that applied at the time the information was collected.

This privacy policy identifies the categories of personally identifiable information that our company collects through our website or online services about individual consumers who use or visit The SEJ's commercial websites or online services in connection with Be Depression Free, and The SEJ websites and the categories of third-party persons or entities with whom our company may share that personally identifiable information.

The SEJ does not maintain an online process for an individual consumer who uses or visits our commercial website or online service to review and request changes to any of his or her personally identifiable information that is collected through our website or online service.

See the section above titled "Changes To This Privacy Policy" for a description of the process by which our company notifies consumers who use or visit our commercial website or online service of material changes to our company's privacy policy for this website or online service.

The effective date of this Privacy Policy is listed at the end of this privacy policy under the heading, "Last Updated."

The term "personally identifiable information" means individually identifiable information about an individual consumer collected online via the Sites from an

individual and maintained by us in an accessible form and may include any of the following:

- 1. A first and last name;
- 2. A home or other physical address, including street name and name of a city or town;
- 3. An e-mail address;
- 4. A telephone number;
- 5. Any other identifier that permits the physical or online contacting of a specific individual; and
- 6. Information concerning a user that the Sites collect online, from the user, and which is maintained in personally identifiable form, in combination with an identifier described within this Privacy Policy.

#### "Cookies" and How We Use Them

A "cookie" is a small data file that can be placed on your hard drive when you visit certain websites. The Sites may use cookies to collect, store, and sometimes track information for purposes stated earlier as well as for statistical purposes to improve the products and services we provide and to manage our telecommunications networks. We may also use cookies for purposes of personalizing your experience on the Sites, or for providing online behavioural advertising such a retargeting or remarketing. These uses provide you with additional opportunities to take advantage of our services or products and provide us with additional opportunities to reach you with personalized offers more tailored to your interests. Advertisers and partners may also use their own cookies (e.g., on their own sites). The SEJ does not control any third party's use of such cookies and we expressly disclaim responsibility for information collected by or through them.

#### **Public Areas & Social Media**

Any information you disclose in any public areas of our website or the Internet, including via social media becomes public information. You should exercise caution when deciding to disclose personal information in these public areas.

This Privacy Policy does not create any contractual or other legal rights in or on behalf of The SEJ or any other party and is not intended to create any such rights.

Questions about this Privacy Policy may be directed to us at:

• Email: enquiries@thesej.co.uk

Last updated on 2<sup>nd</sup> July 2021