# **Mark Wickersham Training International Limited**

## **Privacy Notice**

### Who are we?

We are Mark Wickersham Training International Limited (MWTIL). Our registered office is at 71-75 Shelton Street, Covent Garden, London, England, WC2H 9JQ and our company registered number is 10665464.

We provide various services to individuals and businesses including training, mentoring and coaching and also various software. MWTIL is committed to complying with data protection legislation, which includes telling you what information we collect and store, how we use it and what your rights are. Please read this notice carefully.

#### Who does this notice cover?

This notice covers:-

- Visitors to our websites
- Our clients and their customers
- Partners who we work with to deliver our services (e.g. Kajabi, Stripe, Microsoft Azure)
- Our suppliers (e.g. QuickBooks, Mailchimp) and other third parties who we may do business with

# What personal information we collect and why?

We collect the following information:-

- Identity information including first name, last name and title
- Contact information including your telephone number, address and email address
- Business information such as business name
- Payment details including credit card details or bank account information
- Profile information including purchase history
- Data including third party clients and named contacts of our clients
- Copies of emails
- Responses to question and profile information from our clients' customers

We must have a lawful reason for using any personal information we collect. We will use your information in the following ways:-

- To provide our products and services to you
- Managing payments for our products and services
- Communicating with you to answer your queries on any products and services you have with us
- Performing business tasks that are part of our legitimate interest of running our business.
- To comply with our legal obligations
- If you have given us consent, for marketing purposes. Please note you may opt out of this at any time. If you wish to unsubscribe you should follow the detailed instructions about how to

unsubscribe in the communications that are sent to you. If you have any problems unsubscribing, please contact us on the details below.

If we are required by law, we may sometimes be forced to disclose your data without your knowledge or consent. This would only be done in accordance with the relevant legislation.

### **Bulletin Boards and Chat Areas**

Visitors to our websites are solely responsible for the content of messages they post on MWTIL's forums, such as chat rooms and bulletin boards. Users should be aware that when they voluntarily disclose personal information (e.g. user name, e-mail address, telephone number) on the bulletin boards or in the chat areas, that information can be collected and used by others and may result in unsolicited messages from other people. You are responsible for the personal information you choose to submit in these instances. Please take care when using these features.

#### Our websites and cookies

As a general policy, no personally identifiable information, such as your name, address, or e-mail address, is automatically collected from your visit to our websites. However, certain non-personal information is recorded by the standard operation of the MWTIL's internet servers. Information such as the type of browser being used, its operating system, and your IP address is gathered in order to enhance your online experience.

There may be mailing lists, downloads, special offers, contests, registration forms, and surveys available on our websites. We may request that you give us contact information such as your name, mailing and/or e-mail address, address to access these. Information submitted at the time of submission will be used by MWTIL only as necessary for our legitimate business interests, including without limitation the improvement of our products, services and the contents of our sites. Personally identifiable information is never sold or leased to any third parties. With your permission, we may use your contact information to send you information about MWTIL and our products. You may always opt-out of receiving future mailings as provided above. Please use the contact details below.

Cookies are pieces of information that a website transfers to an individual's computer hard drive for record keeping purposes. Cookies make using our sites easier by, among other things, saving your passwords and preferences for you. These cookies are restricted for use only on our sites and do not transfer any personal information to any other party. Most browsers are initially set up to accept cookies. You can, however, reset your browser to refuse all cookies or indicate when a cookie is being sent. Please consult the technical information relevant to your browser for instructions. If you choose to disable your cookies setting or refuse to accept a cookie, some parts of our sites may not function properly or may be considerably slower.

MWTIL uses the following cookies on its sites:

Cookie	Name	Purpose
_sp_id.0ec5		These cookies are used to record useful information about how many visitors your website receives, how long people spend on your website, and how long they spend on each page. The information gathered by these cookies is anonymous, so cannot be linked back to any individual website user.
_sp_ses.0ec5		(same)
dm_last_page_view		(same)
dm_last_visit		(same)
dm_this_page_view		(same)
dm_timezone_offset		(same)
dm_total_visits		(same)

Cookie	Name	Purpose
intercom-id-rgnxe4c2	Intercom ID	Anonymous visitor identifier cookie for Intercom
intercom-session	Intercom Messenger	Tracks a users individual browser session for Intercom
_ga	Google Analytics	Tracks user and stores website statistics
_fbp	Facebook Tracking Pixel	Used to store and track visits across websites
cfduid	Cloud Flare	Tracks trusted web traffic by Cloudflare
.AspNetCore.Identity.Application		Used to identify a user within EffectivePricing
.AspNetCore.Antiforgery.CAEtWev9XkU		Used to identify a user within EffectivePricing

**Malware/Spyware/Viruses:** MWTIL does not knowingly permit the use of malware, spyware, viruses, and/or other similar types of software on our sites.

We may from time to time include links to third party websites. We are not responsible for how any third party websites collect or use your data. You should read the privacy notices on any websites that you visit.

## How long will we keep personal data?

We will only keep your data for as long as is reasonably necessary to fulfil the purpose for which we have collected. Thereafter we will destroy your data securely.

#### Where do we store data?

Your data may be stored in the UK or the USA and is therefore covered by either UK data protection legislation or the EU-US Privacy Shield, which subjects data to the same level of protection as within the UK. If your data is transferred to other countries we will ensure that they comply with the same level of protection as is available under the UK or the USA.

### Do we share your data with third parties?

In order to provide our services to you, we will share your data with third parties, such as a third party website platform provider (Kajabi) and payment processors (Stripe).

Where your information is transferred to third parties, we will ensure that they will provide the same level of protection for your data as we will.

We will never sell your data.

## What security do we have in place?

We have in place appropriate security measures to prevent your personal information from being accidentally lost or accessed in an inappropriate way. However please be aware that data transmitted by the internet is by its nature insecure and we cannot guarantee the security of data sent online.

### What are your rights?

By using our websites, or buying or products or services you accept the contents of this privacy notice.

Your rights include:-

- Right to be informed about what data we collect and how we use it
- The right to correct any errors in the data we hold
- To have your data deleted but please see the note below\*
- To object to your data being used for any particular purpose
- The right to withdraw consent
- The right to have your data transferred to a third party

\*Please note that if we delete your data, you will not be able to access your previous purchases and these cannot be restored once deleted. Should you wish have only certain aspects of your data deleted and still have access to your products, please contact us on the details below so that we can discuss the options with you.

For more information or to exercise your rights please contact: <a href="mailto:support@wickersham.co.uk">support@wickersham.co.uk</a>

It is important that data is accurate and up-to-date, so please tell us if any of your information changes.

Further information on your rights can be obtained from the Information Commissioner's Office (ICO) which is the UK's main regulator. You can contact them using their online form at <a href="www.ico.org.uk">www.ico.org.uk</a> or calling them on 0303 123 1113.

Please note that we may update this privacy notice from time to time. This notice was last updated in **December 2020**. The most recent policy will always be available on our websites.