
PRIVACY POLICY

BACKGROUND:

Career Thinking (Mark Rice) understands that your privacy is important to you and that you care about how your personal data is used. I respect and value the privacy of everyone who visits this website, www.careerthinking.co.uk (My Site) and will only collect and use personal data in ways that are described here, and in a way that is consistent with my obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is deemed to occur upon your first use of My Site. If you do not accept and agree with this Privacy Policy, you must stop using My Site immediately.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

“Account”	means an account required to access and/or use certain areas and features of My Site;
“Cookie”	means a small text file placed on your computer or device by My Site when you visit certain parts of My Site and/or when you use certain features of My Site. Details of the Cookies used by My Site are set out in Part 14, below; and
“Cookie Law”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;

2. Information About Me

My Site is owned and operated by Career Thinking (Mark Rice), a sole trader.

3. What Does This Policy Cover?

This Privacy Policy applies only to your use of My Site. My Site may contain links to other websites. Please note that I have no control over how your data is collected, stored, or used by other websites and I advise you to check the privacy policies of any such websites before providing any data to them.

4. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

5. **What Are My Rights?**

Under the GDPR, you have the following rights, which I will always work to uphold:

- a) The right to be informed about my collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact me to find out more or to ask any questions using the details in Part 15.
- b) The right to access the personal data I hold about you. Part 13 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by me is inaccurate or incomplete. Please contact me using the details in Part 15 to find out more.
- d) The right to be forgotten, i.e. the right to ask me to delete or otherwise dispose of any of your personal data that I have. Please contact me using the details in Part 15 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to me using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to me directly, I am using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask me for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. I do not use your personal data in this way.

For more information about my use of your personal data or exercising your rights as outlined above, please contact me using the details provided in Part 15.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about my use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

6. **What Data Do We Collect?**

Depending upon your use of My Site, I may collect some or all of the following personal [and non-personal] data (please also see Part 14 on my use of Cookies and similar technologies):

- Name;
- Date of birth;
- Gender;
- Address;
- Email address;
- Telephone number;
- Business name;
- Job title;

- Profession;
- Payment information;
- Information about your preferences and interests;
- IP address;
- Web browser type and version;
- Operating system;
- A list of URLs starting with a referring site, your activity on My Site, and the site you exit to;

7. How Do You Use My Personal Data?

Under the GDPR, I must always have a lawful basis for using personal data. This may be because the data is necessary for my performance of a contract with you, because you have consented to my use of your personal data, or because it is in my legitimate business interests to use it. Your personal data may be used for one of the following purposes:

- [Providing and managing your Account;
- [Providing and managing your access to My Site;
- [Personalising and tailoring your experience on My Site;
- [Supplying my services to you. Your personal details are required in order for me to enter into a contract with you.
- [Personalising and tailoring my services for you.
- [Communicating with you. This may include responding to emails or calls from you.
- [Supplying you with information by email **or** post that you have opted-in to (you may unsubscribe or opt-out at any time by clicking the unsubscribe button or emailing info@careerthinking.co.uk).
- [Analysing your use of My Site and gathering feedback to enable me to continually improve My Site and your user experience.

With your permission and/or where permitted by law, I may also use your personal data for marketing purposes, which may include contacting you by email, telephone, text message or post with information, news, and offers on my services. **You will not be sent any unlawful marketing or spam.** I will always work to fully protect your rights and comply with my obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

Third Parties (including Stripe or PayPal) whose content appears on My Site may use third-party Cookies, as detailed below in Part 14. Please refer to Part 14 for more information on controlling cookies. Please note that I do not control the activities of such third parties, nor the data that they collect and use themselves, and I advise you to check the privacy policies of any such third parties.

8. **How Long Will You Keep My Personal Data?**

I will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- A period of 12 months after initial contact unless there is an ongoing agreement for the provision of my services. In such cases your information will be kept for a period of 12 months after any such provision has ended.

9. **How and Where Do You Store or Transfer My Personal Data?**

I will only store or transfer your personal data within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the GDPR or to equivalent standards by law.

10. **Do You Share My Personal Data?**

I will not share any of your personal data with any third parties for any purposes, subject to one important exception.

In some limited circumstances, I may be legally required to share certain personal data, which might include yours, if I am involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

11. **How Can I Control My Personal Data?**

11.1 In addition to your rights under the GDPR, set out in Part 5, when you submit personal data via My Site, you may be given options to restrict my use of your personal data. In particular, I aim to give you strong controls on my use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from me which you may do by unsubscribing using the links provided in my emails or at the point of providing your details [and by managing your Account]).

11.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

12. **Can I Withhold Information?**

You may access My Site without providing any personal data at all. However, to use all features and functions available on My Site you may be required to submit or allow for the collection of certain data.

You may restrict my use of Cookies. For more information, see Part 14 my Cookie Policy.

13. **How Can I Access My Personal Data?**

If you want to know what personal data I have about you, you can ask me for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 15.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover my administrative costs in responding.

I will respond to your subject access request within 10 working days and, in any case, not more than one month of receiving it. Normally, I aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date I receive your request. You will be kept fully informed of my progress.

14. **How Do You Use Cookies?**

My Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by me and are used only by me. I use Cookies to facilitate and improve your experience of My Site and to provide and improve my services. I have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

By using My Site, you may also receive certain third-party Cookies on your computer or device. Third-party Cookies are those placed by websites, services, and/or parties other than me. Third-party Cookies are used on My Site for payment methods. For more details, please refer to the table below. These Cookies are not integral to the functioning of My Site and your use and experience of My Site will not be impaired by refusing consent to them.

All Cookies used by and on My Site are used in accordance with current Cookie Law.

Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling me to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of My Site may not function fully or as intended. [You will be given the opportunity to allow only first-party Cookies and block third-party Cookies.]

Certain features of My Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown in the table below. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below, but please be aware that My Site may not work properly if you do so. I have taken great care to ensure that your privacy is not at risk by allowing them.

The following first-party Cookies may be placed on your computer or device:

Name of Cookie	Purpose	Strictly Necessary
wordpress_	WordPress cooking for a logged in user	No
wordpress_logged_in_	WordPress cookie for a logged in user	No
wordpress_test_	WordPress cookie for a logged in user	No
wordpress_test_cookie	Checks if cookies are enabled to provide appropriate user experience	No
wp-settings-	WordPress also sets a few wp-settings-[UID] cookies. The number on the end is your individual user ID from the user's database table. This is used to customise your view of admin interface, and possibly also the main site interface.	Yes
wp-settings-time-	WordPress also sets a few wp-settings-[UID] cookies. The number on the end is your individual user ID from the user's database table. This is used to customise your view of admin interface, and possibly also the main site interface.	No
PHPSESSID	To identify your unique session on my website	Yes
SESS	To ensure that you are recognised when you move from page to page within my site and that any information you have entered is remembered.	Yes

and the following third-party Cookies may be placed on your computer or device:

Name of Cookie	Provider	Purpose
__stripe_mid	Stripe	Required by Stripe card payment processing service
__stripe_sid	Stripe	Required by Stripe card payment processing service
external_referer _twitter_sess guest_id	Twitter	These cookies enable us to link with twitter to authorise our use of the widget.
_ga	Google	These cookies enable us to link with twitter to authorise our use of the widget.
CONSENT NID SID OGP	Google ReCaptcha	These cookies are used by Google to track usage of and enable their Google Recaptcha functionality.
woocommerce_cart_hash woocommerce_items_in_cart wp_woocommerce_session_	WooCommerce	The first two cookies contain information about the cart as a whole and helps WooCommerce know when the cart data changes. The final cookie (wp_woocommerce_session_) contains a unique code for each customer so that it knows where to find the cart data in the database for each customer. No personal information is stored within these cookies.

15. How Do I Contact You?

To contact me about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Mark Rice):

Email address: info@careerthinking.co.uk.

16. Changes to this Privacy Policy

I may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if I change my business in a way that affects personal data protection.

Any changes will be immediately posted on My Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of My Site following the alterations. I recommend that you check this page regularly to keep up-to-date.