
BETTER-LIVES - PRIVACY POLICY

BACKGROUND:

Better Lives is the trading name of Abrahamsen Limited a company incorporated in England & Wales and detailed below. Better Lives understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website <https://www.better-lives.co.uk> (“Our Site”) and will only collect and use personal data in ways that are described here, and in a way that is consistent with our 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 requested as soon as you visit Our Site.

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 Our Site;
“Cookie”	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in Our Cookies Policy here https://www.better-lives.co.uk/cookie-policy ; and
“Cookie Law”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003 and any Regulations or Statute amending or replacing the same;

2. Information About Us

Our Site is owned and operated by Abrahamsen Limited trading as Better Lives a limited company registered in England & Wales.

Business address: 23 Aysgarth Park Holyport Maidenhead Berkshire SL6 2HG

Registered office address: 11 Castle Hill, Maidenhead Berkshire SL6 4AA
Company Registration No: 10609207
Data Protection Officer: Peter Abrahamsen

Email address: peter@better-lives.co.uk

Telephone number: +44 (0)7754 652 590

Postal address: 23 Aysgarth Park Holyport Maidenhead Berkshire SL6 2HG

3. **What Does This Policy Cover?**

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we 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”) and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) 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 Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 15.
- b) The right to access the personal data we 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 us is inaccurate or incomplete. Please contact us using the details in Part 15 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us 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 us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.

- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

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

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

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 our use of your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 15.

6. What Data Do You Collect and How?

Depending upon your use of Our Site, we may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. Please also see Part 14 for more information about our use of Cookies and similar technologies and our Cookie Policy <https://www.better-lives.co.uk/cookie-policy>. We do not collect any ‘special category’ or ‘sensitive’ personal data save that we do collect personal data relating to children 13 years and older and cannot provide contracted services otherwise. Such information is provided consensually by parents, guardians or schools with authority. We do not collect personal data relating to criminal convictions and/or offences.

Data Collected	How We Collect the Data
Identity Information including name; title; date of birth; gender.	Through our website using the online enquiry form; online Order form; email post or over the telephone.
Contact information including postal address; residence address; phone & mobile; email.	Through our website using the online enquiry form; online Order form; email post or over the telephone.
Business information including business name; job title; profession; nature of business; place of business; contact information.	Through our website using the online enquiry form; online Order form; email post or over the telephone.

Payment information including card details; bank information;	Through our website using the online enquiry form; online Order form; email post or over the telephone.
Profile information including preferences; interests; purchase history; login details;	Through our website using the online enquiry form; online Order form; email post or over the telephone.
Technical information including IP address; browser type; browser version; operating system.	Through our website using the online enquiry form; online Order form; email post or over the telephone.
Data from third parties including technical information; contact information; profile information.	Through our website using the online enquiry form; online Order form; email post or over the telephone.

7. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and Our lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
Accessing Our Site and contacting Us.	Contact; Identity; enquiry; Business.	Legitimate interest; We have a commercial interest in using your data to deal with your enquiry.
Providing and managing your Account with Us, registering you, booking calls.	Identity; Contact; Business; Payment; Technical; 3 rd Party Data, includes 3 rd parties.	Consent. You give positive consent when applying to open the account with Us and use the website and receive Our services.
Providing and managing your access to Our Site.	Identity; Contact; Business; Payment; Technical; 3 rd Party Data, includes 3 rd parties.	Consent. You give positive consent when applying to open the account for services and use the website.
Personalising and tailoring your experience on Our Site.	Identity; Contact; Business; Payment; Technical; 3 rd Party Data, includes 3 rd parties.	Consent. You give positive consent when applying to open the account and use the website.
Administering Our Site.	Identity; Contact; Business; Payment; Technical; 3 rd Party Data includes 3 rd	Legitimate interest; We have a commercial interest in using your data to

	parties.	administer Our Site.
Administering our business.	Identity; Contact; Business; Payment; Technical; 3 rd Party Data, includes 3 rd parties.	Legitimate interest; We have a commercial interest in using your data to administer Our business.
Supplying our services to you.	Identity; Contact; Business; Payment; Technical; 3 rd Party Data; providing webinars, coaching sessions, tailored services, includes 3 rd parties.	Contract. We cannot fulfil the provisions of Our Services to you unless we use your Data.
Managing payments for our services.	Identity; Contact; Business; Payment; Technical; 3 rd Party Data, includes 3 rd parties.	Contract. By contracting to take Our services you agree to our using Data for these purposes.
Personalising and tailoring our services for you.	Identity; Contact; Business; Payment; Technical; 3 rd Party Data, includes 3 rd parties.	Consent. You consent to our use of Data to provide you with a personalised service and which you will then enter into a contract to purchase.
Communicating with you.	Identity; Contact; Business; Payment; Technical; 3 rd Party Data, includes 3 rd parties.	Consent.
Supplying you with information by email AND/OR post that you have opted-in-to (you may opt-out at any time by email or telephone.)	Identity; Contact; Business; Payment; Technical; 3 rd Party Data; offers; news; marketing, includes 3 rd parties.	Consent.

7.1 With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email AND/OR telephone, text message or post with information, news, and offers on our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, (as amended) and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

7.2 Third Parties whose content appears on Our 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 we do not control the activities of such third parties, nor the data that they collect and use themselves, and we advise you to check the privacy policies of any such third parties to see how they use your data and your Data Rights.

7.3 More specifically we use “social buttons”. These enable you to share or bookmark the web pages. These include but may not be limited to Twitter, Google +1, Facebook “Like”, LinkedIn “share”. As 7.2 above these sites may collect data

7.4 We use external web services to display content on our web pages. We may use SlideShare or YouTube and Vimeo and similar. The same data privacy provisions as 7.2 and 7.3 apply.

7.5 We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 15.

7.6 If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

7.7 In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

7.8 Third parties that We may use will include for processing your payments. We do not store your credit/card or financial information. We may use third parties for site maintenance, technical support, website hosting, identity verification.

8. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. We are required by law to retain records for certain purposes such as HMRC and tax for at least 6 years. Accordingly we will keep Data for 6 years and thereafter it will be deleted.

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

We will only store or transfer your personal data within the UK. This means that it will be fully protected under the Data Protection Legislation. In some circumstances our cloud based servers may be outside of the UK.

In such case We may 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 Data Protection Legislation, GDPR, and/or to equivalent standards by law but where our cloud servers are based in countries that are not part of the European Economic Area known as “third countries” they may not

have data protection laws that are as strong as those in the UK and/or the EEA. This means that we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation.

Please contact us using the details below in Part 15 for further information about the particular data protection mechanisms used by us when transferring your personal data to a third country.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so.

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

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are 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 Data Protection Legislation, set out in Part 5, when you submit personal data via Our Site, you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails and 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 Our Site without providing any personal data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

You may restrict our use of Cookies. For more information, see Part 14 our Cookie Policy <https://www.better-lives.co.uk/cookie-policy>

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

If you want to know what personal data we have about you, you can ask us 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. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

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 our administrative costs in responding.

We will respond to your subject access request within 21 calendar days and, in any case, not more than one month of receiving it. Normally, we 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 we receive your request. You will be kept fully informed of our progress.

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

Our Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve our services. We 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 Our 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 us. For more details, please refer our Cookie Policy here <https://www.better-lives.co.uk/cookie-policy>

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

Before Cookies are placed on your computer or device, you will be shown a prompt or pop up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us 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 Our Site may not function fully or as intended.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

15. **How Do I Contact You?**

To contact us 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 Peter Abrahamsen):

Email address: peter@better-lives.co.uk

Telephone number: +44 (0)7754 652 590

Postal Address: 23 Aysgarth Park Holyport Maidenhead Berkshire SL6 2HG

16. **Changes to this Privacy Policy**

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

Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated in April 2022.