CONVERSATIONS THAT COUNT
DATA PRIVACY POLICY

Welcome to the data privacy policy of Simon Garnett, trading as Conversations That Count.

This data privacy policy covers the usage and protection of personal data. I am Simon Garnett, the owner and principal coach of Conversations That Count (**I**, **me** or **my**). You are the individual receiving coaching or mediation services from me (**you** or **your).**

I respect your privacy and am committed to protecting your personal data. This privacy policy will inform you as to how I look after your personal data when you visit my website (regardless of where you visit it from) or contact me via email or phone and share your data with me. It also tells you about your privacy rights and how the law protects you.

1. Important information and who I am

Purpose of this privacy policy

This privacy policy aims to give you information on how I collect and process your personal data through your use of this website, my social media channels and other platforms provided by me, including any data you may provide through this website when you complete any forms on my site or send any information to me as well as any data that you provide to me in person, via email or on the phone. It is important that you read this privacy policy so that you are fully aware of how and why I am using your data.

I do not collect any data relating to children.

I am the controller and responsible for your personal data. If you have any questions on this policy, including any questions about this policy or how I handle your personal data, or if you wish to exercise your legal rights under *Your legal rights*, please contact me using the details under *Privacy Contacts.*

Information Commission's Office (**ICO**) registration: **ZC246069**

Contact details: *simon@conversationsthatcount.uk*

Your duty to inform me of changes

It is important that the personal data I hold about you is accurate and current. Please keep me informed if your personal data changes during your relationship with me.

Third-party links

My website may include links to third-party websites. I do not control, and I am not responsible, for the content or practices of these websites. The inclusion of such links does not imply my endorsement of these websites, their content, their owners, or their practices. This privacy policy does not apply to these other websites. These websites are subject to their own privacy and other policies. I recommend reviewing the privacy policies of any third-party websites you visit.

2. The data I collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

I may collect, use, store and transfer different kinds of personal data about you which I have grouped together as follows:

- **Identity Data** includes first and last name.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes billing information and payment details (processed via PCI – compliant third-party payment processors).
- **Technical Data** includes internet protocol (IP) address, device identifiers, browser and operating system information, telemetry, diagnostics, your login data, time zone setting and location, and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you use my website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from me and third parties and your communication preferences.
- **Special Categories of Personal Data** this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data.

I could process information about criminal convictions and offences during the course of my work. Your consent will be sought for this type of data to be processed.

If you fail to provide personal data

Where I need to collect personal data by law, or under the terms of a contract I have with you, and you fail to provide that data when requested, I may not be able to perform the contract I have or are trying to enter into with you.

3. How is your personal data collected?

I use different methods to collect data from and about you including through:

- **Direct interactions.** You may give me your Identity, Contact and Financial Data by filling in forms or by corresponding with me by post, phone, email or otherwise. This includes processing personal data for the purpose of:
    - providing and maintaining my services to you.
    - notifying you about changes to my services.
    - providing client support.
    - gathering analysis or valuable information so that I can improve my services.
    - monitoring the usage of my services.
    - detecting, preventing and addressing technical issues.

- providing you with news, special offers and general information about other services which I offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information.

- **Automated technologies or interactions.** As you interact with my website, I will automatically collect Technical Data about your equipment, browsing actions and patterns. I collect this personal data by using cookies, server logs and other similar technologies. I may also receive Technical Data about you if you visit other websites employing my cookies. Please see the cookie policy for further details.
- **Third parties or publicly available sources.** I will receive personal data about you from various third parties and public sources as set out below:

  Technical Data from the following parties:

  (a) advertising networks such as Google;
  (b) search information providers such as Google; and
  (c) marketing platform providers such as LinkedIn.

Cookies

I use cookies to distinguish you from other users of my website. This helps me to provide you with a good experience when you browse my website and also allows me to improve the site. A cookie is a small file of letters and numbers that I store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive. I use strictly necessary cookies which are essential to provide you with services available through the website and to enable you to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these cookies, the services that you have asked for cannot be provided, and I only use these cookies to provide you with those services.

You can manage your cookie preferences at any time by using the cookie banner. You may accept all cookies, disable cookies where possible to do so or adjust settings by category. You can also control cookies through your browser settings, including blocking or deleting cookies. How to do this depends by browser. Please note that disabling certain cookies may affect the functionality and performance of the website and some features may not work as intended. For more information on the cookies I collect, please refer to the cookie policy.

4. How I use your personal data

I will only use your personal data when the law allows me to. Most commonly, I will use your personal data in the following circumstances:

- Where I need to perform the contract, I am about to enter into or have entered into with you.
- Where it is necessary for my legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where it is necessary for my recognised legitimate interests (**RLIs**). These are different to legitimate interests. RLIs apply where there are public interest reasons for processing (such as preventing or detecting crime, safeguarding individuals, responding to emergencies, supporting national or public bodies when they confirm it is necessary for their official functions). RLIs are legally recognised within data protection law. Where Irely on an RLI, I will ensure the use is strictly necessary and only use or share the minimum data required.
- Where I need to comply with a legal obligation.

Generally, I do not rely on consent as a legal basis for processing your personal data although I will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting me.

Purposes for which I will use your personal data

I have set out below, in a table format, a description of all the ways I plan to use your personal data, and which of the legal bases I rely on to do so. I have also identified what my legitimate interests are where appropriate.

Note that I may process your personal data for more than one lawful ground depending on the specific purpose for which I am using your data. Please contact me if you need details about the specific legal grounds, I am relying on to process your personal data where more than one ground has been set out in the table below:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a client or supplier	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your services including: (a) managing and maintaining client relationships (b) managing payments, fees, and charges (c) collecting and recovering money owed to me	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for my legitimate interests (to recover debts due to me)

(a) notifying you about changes to my terms or privacy policy (b) asking you to leave a review or take a survey	(a) Identity (b) Contact (c)Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for my legitimate interests (to keep my records updated, to grow my business and to study how client use my services)
To administer and protect my business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for my legitimate interests and RLIs (for running my business, provision of administration and IT services, network security and to prevent fraud) (b) Necessary to comply with a legal obligation
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Marketing and Communications	Necessary for my legitimate interests (to develop my services and grow my business)

Marketing

I strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from me

I may use your Identity, Contact, Technical and Usage Data to form a view on what I think you may want or need, or what may be of interest to you. This is how I decide which services and offers may be relevant for you (I call this marketing).

You will receive marketing communications from me if you have requested information from me or purchased services from me and you have not opted out of receiving that marketing.

Third-party marketing

I will get your express opt-in consent before I share your personal data with any third party for marketing purposes.

Opting out

You can ask me or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting me at any time.

Change of purpose

I will only use your personal data for the purposes for which I collected it, unless I reasonably consider that I need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact me.

If I need to use your personal data for an unrelated purpose, I will notify you and I will explain the legal basis which allows me to do so.

Please note that I may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. International Transfer of Data

Some of my external parties are based outside the UK and EEA so the processing of your personal data will involve a transfer of data outside the UK and EEA. For example, I may transfer your personal data to service providers that carry out certain functions on my behalf. It may also be processed by staff operating outside the UK and EEA who work for one of my suppliers. If your personal data is transferred to, stored at, or otherwise processed in a country or territory outside the UK and EEA, and that country or territory has not been recognised as providing an adequate level of data protection, I will put in place additional safeguards to protect your personal data, based on specific contracts approved for use in the UK and EEA which give personal data the same protection it has in the UK and EEA. Please contact me if you want further information on the specific mechanism used by me when transferring your personal data out of the UK and EEA.

6. Disclosures of your personal data

I may share your personal data with third parties for the purposes set out in the table *Purposes for which I will use your personal data* above. I require all third parties to respect the security of your personal data and to treat it in accordance with the law. I do not allow third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with my instructions.

7. Data security

Unfortunately, the transmission of information via the internet is not completely secure. Although I will take reasonable steps to protect your personal data, I cannot guarantee the security of your data transmitted to my site; any transmission is at your own risk.

I have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, I limit access to your personal data to those agents, contractors and other third parties who have a business need to know. They will only process your personal data on my instructions, and they are subject to a duty of confidentiality. I request that third-party contractors and site service providers follow similar standards of security and confidentiality.

I have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where I am legally required to do so.

8. Data retention

How long will you use my personal data for?

I will only retain your personal data for as long as reasonably necessary to fulfil the purposes I collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. I may retain your personal data for a longer period in the event of a complaint or if I reasonably believe there is a prospect of litigation in respect to my relationship with you.

To determine the appropriate retention period for personal data, I consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which I process your personal data and whether I can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting, or other requirements.

In some circumstances you can ask me to delete your data: see *your legal rights* below for further information.

In some circumstances I will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case I may use this information indefinitely without further notice to you.

No fee usually required

I will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, I may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, I could refuse to comply with your request in these circumstances.

What I may need from you

I may need to request specific information from you to help me confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. Ie may also contact you to ask you for further information in relation to your request to speed up my response.

Time limit to respond

I try to respond to all legitimate requests within one month. Occasionally it could take me longer than a month if your request is particularly complex or you have made a number of requests. In this case, I will notify you and keep you updated.

9. Use Of Artificial Intelligence (AI) Technologies

I use approved third-party AI technologies, operating under data processing agreements with model training disabled and data retention protections enabled, to help me triage, summarise, and draft responses to your enquiries and correspondence. I review any AI-assisted response before it is sent. These providers act as my processors and do not use your information for their own purposes. The purposes for which AI technologies will be used include, but are not limited to:

- Data Analysis and Insights: AI tools will analyse data to provide insights that help us improve my services and tailor them to client needs.
- Security and Fraud Prevention: AI tools will be used to detect and prevent fraudulent activities, ensuring the safety and integrity of my systems.
- Personalisation: AI tools will assist in personalising client experiences by recommending content or services based on client preferences and behaviour.

I am committed to using AI responsibly and ethically. To this end, I implement reasonable and appropriate controls to manage the use of AI technologies, including rigorous validation procedures to mitigate and prevent inappropriate bias in AI outputs. These measures ensure that the results generated by AI are fair, accurate, and aligned with the purposes for which they are intended.

Safeguards for AI Use and Your Rights

Your personal data will only be processed using AI technologies in ways that are lawful, transparent, and consistent with the purposes outlined in this privacy policy. To protect your rights, I apply the following safeguards when using AI technologies:

1. **Human Oversight**: AI-driven processes that could result in decisions with legal or similarly significant effects are subject to meaningful human oversight to ensure fairness, accuracy, and accountability.
2. **Bias Prevention**: I continuously assess and address potential biases in AI algorithms and models to ensure that outputs are equitable and inclusive.
3. **Data Protection**: All data processed using AI is handled securely and in compliance with applicable data protection laws.
4. **Transparency**: I strive to provide clear information about how AI Technology is used, the purposes of its use, and the potential impacts on you.

Limitations of AI Use

I do not use AI technologies to make decisions that have a significant legal effect on you without your explicit consent or appropriate safeguards, such as ensuring human review. Additionally, AI technologies are not used for profiling that would infringe upon your rights or freedoms under applicable privacy laws.

10. Glossary

Consent means when you freely provide a specific, informed and unambiguous indication of your wishes through a written statement or clear affirmative action, inter alia, to being contacted by me in relation to marketing, or being asked to participate in a market research project which would be collected on my behalf by me or my third-party recruiters.

Legitimate Interest means the interest of my business in conducting and managing my business to enable me to give you the best service and the best and most secure experience. I make sure I consider and balance any potential impact on you (both positive and negative) and your rights before I process your personal data for my legitimate interests. I do not use your personal data for activities where my interests are overridden by the impact on you (unless I have your consent or are otherwise required or permitted to by law). You can obtain further information about how I assess my r legitimate interests against any potential impact on you in respect of specific activities by contacting me.

Recognised Legitimate Interest means a specified purpose for handling personal data that is in the public interest and covers situations, such as crime prevention, public security, national security or defence, safeguarding, emergencies or sharing personal information to help other organisations perform their public tasks or official functions. Although there is no requirement for me to assess whether a person's rights, freedoms or interests outweigh the recognised legitimate interest, I must consider whether the activity I want to do is necessary.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that -I am subject to.

11. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data I hold about you and to check that - I am lawfully processing it.

Request correction of the personal data that I hold about you. This enables you to have any incomplete or inaccurate data I hold about you corrected, though I may need to verify the accuracy of the new data you provide to me.

Request erasure of your personal data. This enables you to ask me to delete or remove personal data where there is no good reason for me continuing to process it. You also have the right to ask me to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where I may have processed your information unlawfully or where - I am required to erase your personal data to comply with local law. Note, however, that I may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where I am relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where I am processing your personal data for direct marketing purposes. In some cases, I may demonstrate that I have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask me to suspend the processing of your personal data in the following scenarios:

- If you want me to establish the data's accuracy.
- Where my use of the data is unlawful, but you do not want me to erase it.
- Where you need me to hold the data even if I no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to my use of your data, but I need to verify whether I have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. I will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for me to use or where I used the information to perform a contract with you.

Withdraw consent at any time where I am relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, I may not be able to provide certain services to you. I will advise you if this is the case at the time you withdraw your consent.

12. Data Protection Complaints

I am committed to protecting the personal data of my clients and take all complaints seriously.

If a data subject believes that I have not handled their personal information in accordance with applicable privacy laws or this privacy policy, they have the right to make a complaint, and I will work to resolve it promptly.

Step 1: Contact Me First

Data subjects must give me the opportunity to resolve their concern before escalating to a regulator.

To raise a privacy complaint, data subjects must contact me. Details are provided below:

Email: *simon@conversationsthatcount.uk*

Subject line: Privacy Complaint

It must include:

- Full name and contact details
- A full description of the complaint

If the data subject is based in the United Kingdom, they may also write to me at 7 Beaconsfield Road, Twickenham, Middlesex TW1 3HX.

I will acknowledge the complaint within 5 business days and aim to provide a full response within 30 days. If the complaint is complex and requires more time, I will inform the data subject.

Step 2: If The Data Subject Is Not Satisfied

If the data subject is dissatisfied with my response, or if I have not resolved the complaint within 30 days, the data subject can escalate to the relevant regulator for their location.

If the data subject is based in the United Kingdom, they are required to lodge their complaint with me through one of the means described in Step 1 before escalating to the ICO.

The ICO expects individuals to raise their concern with me first.

Information Commission's Office *www.ico.org.uk*

Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Helpline number: 0303 123 1113

13. Changes to the privacy policy

I keep my privacy policy under regular review. This version was last updated on 6 October 2026.