

Data Privacy Policy

This Privacy Policy describes Leading Practice Ltd's practices regarding the collection, use and disclosure of the information we collect from and about you when you use Leading Practice Ltd's website, mobile applications, social media, products and services. By accessing or using the services, you agree to this Privacy Policy.

IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, PLEASE DO NOT USE THE SERVICES.

This Privacy Policy contains the following sections:

- The Information We Collect
- How We Use Your Information
- Cookies and Similar Technologies
- Online Analytics and Advertising
- How We Share and Disclose Your Information
- Your Choices
- Third Party Links and Services
- Children's Privacy
- International Transfer of Data
- Your Rights
- How Long We Store Your Information
- Changes to Our Privacy Policy
- How We Protect Your Information
- Active Step Healthcare Ltd Contact Information

THE INFORMATION WE COLLECT

Leading Practice Ltd collects a variety of information that you provide directly to us. We process your information, when necessary, to provide you with the services that you have requested when accepting our Terms of Service, or where we have obtained your prior consent, or where we have a legitimate interest to do so. For example, we may have a legitimate interest to process your information for to be able to provide treatment, invoice & billing, and enhancement purposes of the services we provide to you, or for analytics, research, and reporting purposes. Without your information, we cannot provide you with the services you have requested or you may be limited in your use of the services.

1. Information You Provide to Us

Leading Practice Ltd collects information from you through:

- Client Enquiries and Registration.
- Leading Practice Ltd services that you use.
- Requests or questions you submit to us via forms or email (e.g., website enquiries, website chat enquiry, direct email, facebook messenger).
- Your communications and dealings with us.
- Your participation in Leading Practice Ltd sweepstakes, contests, or research studies.
- Uploads or posts to social media, website & use of service.
- Requests for information through 3rd parties or 3rd party referrals assistance.

Information from and about you:

- The types of information we collect will depend upon the services you use, how you use them, and what you choose to provide.
- The types of data we collect directly from you may include:
 - Name, address, D.O.B, telephone numbers and email address.
- Optional information may include photographs, patient relationships, referral sources etc.
- Log-in details and password, if you create a Leading Practice Ltd account.
- Any email requests or questions you submit to us.
- Demographic information such as your gender, age, etc.
- User-generated content you post in public online platforms.

Content:

We are required to generate records of all clients for notes and continuity purposes. Professional coaching accreditation mandates that all data must be kept for a period no shorter than seven years. This does not impede your right to be forgotten. We are able to archive your content upon your request but your coaching records and notes must be kept in line with accreditation guidelines.

Information about others:

If you choose to recommend our services online, via social media, on use our online referral service we will use that person's contact information, which may include their email address or their social network identity, to send an invitation. Leading Practice Ltd stores the information you provide to send the invitation & to register that person.

2. Information We Automatically Collect

When you use our services that connect to the Internet, including, but not limited to, when you access the services via our website, your mobile devices, any Leading Practice Ltd software/applications, we automatically collect certain information as described in this Section. As discussed further below, we and our service providers (which are third party companies that work

on our behalf to provide and enhance the services) use a variety of technologies, including cookies and similar tools, to assist in collecting this information.

Log Files:

When you use the services, our servers automatically record certain information in server logs. These server logs may include information such as your web request, Internet Protocol (“IP”) address, browser type and settings, referring / exit pages and URLs, number of clicks and how you interact with links on the services, metadata associated with uploaded Content, domain names, landing pages, pages viewed, mobile carrier, date and time stamp information and other such information.

Device Identifiers:

When you access the services using a mobile device, we collect specific device information, including your MAC address and other unique device identifiers. We also collect information such as the type of device you are using, its operating system, and mobile network information, which may include your mobile phone number. We may associate this device identifier with your account and will use data associated with your device identifier to customize our services to your device and to analyse any device-related issues.

Location Information:

We collect and process general information about the location of the device from which you are accessing the Service (e.g., approximate geographic location inferred from an IP address).

3. Information We Collect From Third-Party Integrations

When you use third-party integrations (e.g., Drift, Facebook Messenger, Slack, Asana etc), such providers may allow us to have access to and store additional information about your interaction with those services and platforms as it related to use of the services. If you do not wish to have this information shared, do not initiate these connections.

4. Information We Collect from Affiliates and Non-Affiliated Third Parties

Active Step Healthcare Ltd may receive additional information about you, such as demographic information, from third parties, such as business partners, marketers, researchers, analysts, and other parties (e.g facebook) that we may use to supplement the information that we collect directly from you.

COOKIES AND SIMILAR TECHNOLOGIES

To collect the information in the “Information We Automatically Collect” section above, we and our service providers use Internet server logs, cookies, tags, SDKs, tracking pixels, and other similar tracking technologies. A web server log is a file where website activity is stored. An SDK is a section

of code that we embed in our applications and software to allow third parties to collect information about how users interact with the services. A cookie is a small text file that is placed on your computer or mobile device when you visit a site, that enables us to: (i) recognize your computer and login session; (ii) store your preferences and settings; (iii) understand which web pages of the services you have visited; (iv), enhance your user experience by delivering and measuring the effectiveness of content and advertising tailored to your interests; (v) perform analytics; and (vi) assist with security and administrative functions. Tracking pixels (sometimes referred to as web beacons or clear GIFs) are tiny electronic tags with a unique identifier embedded in websites, online ads and/or email, and that are designed to provide usage information like ad impressions or clicks, email open rates, measure popularity of the services and associated advertising, and to access user cookies. As we adopt additional technologies, we may also gather information through other methods.

Please note that you can change your settings to notify you when a cookie is being set or updated, or to block cookies altogether. Please consult the “Help” section of your browser for more information (e.g., Internet Explorer; Google Chrome; Mozilla Firefox; or Apple Safari).

HOW WE USE YOUR INFORMATION

We use your information (including any information that we collect, as described in this Privacy Policy) for various purposes depending on the types of information we have collected from and about you and the specific Leading Practice Ltd services you use, including to:

- Provide the services you have requested.
- Respond to your request for information and provide you with more effective and efficient customer service.
- Provide you with product updates and information about products & services you have purchased from us.
- Provide you with service notifications via email and SMS.
- Contact you by email, postal mail, or phone regarding Leading Practice Ltd and third-party products, services, surveys, research studies, promotions, special events and other subjects that we think may be of interest to you.
- Customize the advertising and content you see.
- Help us better understand your interests and needs and improve our services.
- Synthesise and derive insights from your use of different Leading Practice Ltd products and services.
- Engage in analysis, research, and reports regarding use of our services.
- Provide, manage, and improve the services.

ONLINE ANALYTICS AND ADVERTISING

1. Analytics

We use third-party web analytics services (e.g., Google Analytics) on our services to collect and analyse the information discussed above, and to engage in auditing, research and reporting. The information (including your IP address) collected by various analytics technologies described in the “Cookies and Similar Technologies” section will be disclosed to or collected directly by these service providers.

2. Online Advertising

Third parties or affiliates may administer Leading Practice Ltd banner advertising programs and other online marketing on non-Leading Practice Ltd websites and services. To do so, these parties may set and access first-party cookies delivered from a Leading Practice Ltd domain, or they may use third-party cookies or other tracking mechanisms. For example, a third-party provider may use the fact that you visited the Leading Practice Ltd website to target online ads for Leading Practice Ltd services to you on non-Leading Practice Ltd websites. Or a third-party ad network might collect information on the services and other websites to develop a profile of your interests and target advertisements to you based on your online behaviour. These parties that use these technologies may offer you a way to opt out of ad targeting as described below. You may receive tailored advertising on your computer through a web browser.

HOW WE SHARE YOUR INFORMATION

Leading Practice Ltd will share your information in the following ways:

- **Service Providers.**
We may provide access to or share your information with select third parties who perform services on our behalf. These third parties provide a variety of services to us, including without limitation product manufacture, billing, sales, marketing, provision of content and features, advertising, analytics, research, customer service, shipping and fulfilment, data storage, security, fraud prevention, payment processing, and legal services.
- **Third-Party Integrations.**
When you initiate a connection with a third-party integration through the services (e.g., Drift, Facebook Messenger, Slack, Asana etc), we will share information about you that is required to enable your use of the third-party integration through the services.
- **Business Transfers.**
If the ownership of all or substantially all of our business changes, we may transfer your information to the new owner so that the services can continue to operate. In such case, your information would remain subject to the promises and commitments contained in this Privacy Policy until such time as this Privacy Policy is updated or amended by the acquiring party upon notice to you. If such transfer is subject to additional mandatory restrictions under applicable laws, Leading Practice Ltd will comply with such restrictions.

- **Public Forums.**
The services make it possible for you to upload and share comments or feedback publicly (i.e., outside of the Leading Practice Ltd mobile and web app) with other users, such as on the Leading Practice Ltd social media, blogs etc. Any information that you submit through such public features is not confidential, and Leading Practice Ltd may use it for any purpose (including in testimonials or other Leading Practice Ltd marketing materials). Any information you post openly in these ways will be available to the public at large and potentially accessible through third-party search engines. Such information can be read, collected and/or used by other users, and it could be used to send you unsolicited messages. Accordingly, please take care when using these features of the services.
- **Aggregate/De-Identified Information.**
From time to time, Leading Practice Ltd may share Aggregate/De-Identified Information about use of the services, such as by publishing a report on usage trends. As stated above, this Policy places no limitations on our use or sharing of Aggregate/De-Identified Information.

YOUR CHOICES

We provide you with a number of choices with respect to the information we collect and use as discussed throughout this Privacy Policy. For example: – You may instruct us not to use your contact information to contact you by email, postal mail or phone regarding products, services, promotions and special events that might appeal to your interests by contacting us at any time. In commercial email messages, you can also opt out by following the instructions located at the bottom of such emails. Please note that, regardless of your request, we may still use and share certain information as permitted by this Privacy Policy or as required by applicable law. For example, you may opt out of certain operational or service-related emails, such as those reflecting our relationship or transactions with you, but we have to retain your medical records for a period of at least seven years.

THIRD PARTY LINKS AND SERVICES

The services contain links to third-party websites such as social media sites, and also contain third-party integrations. If you choose to use these sites or integrations, you may disclose your information not just to those third-parties, but also to their users and the public more generally depending on how their services function. Because these third-party websites and services are not operated by Leading Practice Ltd, Leading Practice Ltd is not responsible for the content or practices of those websites or services. The collection, use, and disclosure of your personal and other information will be subject to the privacy policies of the third party websites or services, and not this Policy. We urge you to read the privacy and security policies of these third-parties.

INTERNATIONAL TRANSFER OF DATA

Leading Practice Ltd complies with EU General Data Protection Regulation (GDPR).

The GDPR imposes restrictions on the transfer of personal data outside the European Union, to third countries or international organisations, in order to ensure that the level of protection of individuals afforded by the GDPR is not undermined. Personal data may only be transferred outside of the EU in compliance with the conditions for transfer set out in Chapter V of the GDPR. Transfers may be made where the Commission has decided that a third country, a territory or one or more specific sectors in the third country, or an international organisation ensures an adequate level of protection. Any data that leaves the EU and is processed in the United States of America is protected under the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework as set forth by the EU parliament and the UK's Information Commissioner's office regarding the collection, use, and retention of personal information from the European Union and Switzerland to the United States.

In compliance with the GDPR, EU-US Privacy Shield and Swiss-US Privacy Shield Principles, Leading Practice Ltd commits to resolve complaints about your privacy and our collection or use of your personal information. European Union or Swiss citizens with enquiries or complaints regarding this privacy policy should first contact Leading Practice Ltd at: paul@leadingpractice.co.uk.

We may transfer information that we collect about you to third party processors across international borders outside the EU. These third parties may have access to your information for the limited purpose of providing the service we have contracted with them to provide. They are required to have a privacy policy and security standards in place that are at least as protective of your information as is this Privacy Policy (including those provisions related to compliance with the EU-US and Swiss-US Privacy Shield). Leading Practice Ltd will take reasonable and appropriate steps necessary to ensure that any third party who is acting as a "data processor" under EU and Swiss terminology is processing the personal information we entrust to them in a manner that is consistent with the EU-US and Swiss-US Privacy Shield Principles.

YOUR RIGHTS

If you want to learn more about the information collected through the services, or if you would like to access or rectify your information and/or request deletion of information we collect about you or restrict or object to the processing of your information, please contact us using the contact information below. You may have to make a 'Subject Access Request' This is covered in the ICO's Subject Access Request Policy which is available on request. Where you have provided consent, you may withdraw your consent at any time, without affecting the lawfulness of the processing that was carried out prior to withdrawing your consent. If you are dissatisfied with the way we process your information, you may lodge a complaint with the ICO (Information Commissioner's Office) the UK's independent body set up to uphold information rights.

HOW LONG WE STORE YOUR INFORMATION



Leading Practice Symposium

Saturday 12 October 2024

We will retain your information for the period necessary to fulfil the purposes outlined in this Policy unless a longer retention period is required or permitted by law.

CHANGES TO OUR PRIVACY POLICY

We reserve the right to amend this Policy at any time to reflect changes in the law, our data collection and use practices, the features of our services, or advances in technology. We will make the revised Policy accessible through the services, so you should review the Policy periodically. If we make a material change to the Policy, you will be provided with appropriate notice and we will seek your consent to the updated Policy in accordance with legal requirements.

HOW WE PROTECT YOUR INFORMATION

Leading Practice Ltd takes technical and organisational measures to protect your personal data against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access. However, no method of transmission over the Internet, and no means of electronic or physical storage, is absolutely secure, and thus we cannot ensure or warrant the security of that information. If you have any questions about security on our services, you can contact us at paul@leadingpractice.co.uk

ACTIVE STEP HEALTHCARE LTD CONTACT INFORMATION

The data controller of your information is Paul Kinkaid, Leading Practice Ltd, located at 1 Kingsmill Drive, Fair Oak, Hampshire, SO50 7QE. If you wish to contact us or have any questions about or complaints in relation to this Privacy Policy, please contact us at paul@leadingpractice.co.uk

OUR EVENT ORGANISERS

To read the privacy policy for The Compleat Group Ltd please visit <https://www.compleatgroup.co.uk/privacy-policy>