

Karen Robertson – Empower Dyslexic Kids - Privacy Policy

Date: July 6, 2023

Introduction:

The bottom line is we highly respect and protect your data. You only receive communications from us if you have opted in on one of our website forms or have sent us an email specifically requesting information. You can opt out at any time by hitting the “unsubscribe” link in EVERY email that we send out.

Data is stored in a secure database system called GetResponse and only need-to-know team members have access to that data. All financial data is encrypted and cannot be accessed by our team.

It is your responsibility as a user of our website to conduct any necessary background checks or reference checks on any person or resource listed on our site that you might want to hire or to purchase.

Privacy Policy

The following PRIVACY POLICY is subject to change at any time and at the sole discretion of the site owner and operator. Please visit the site regularly for updates.

This privacy policy provides you with details of how we collect and process your personal data through your use of our site www.EmpowerDyslexicKids.com when you sign up for our newsletter, sign up for a free training, or purchase a product or service.

Karen Robertson is the *data controller* and we are responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice).

- Karen Robertson (DBA Robertson Direct)
- karen@empowerdyslexickids.com
- 1/39 Lodge St, Balgowlah NSW 2093, Australia

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at karen@empowerdyslexickids.com.

1. Parental Consent

Our website is not directed to children under the age of 18. We strongly recommend that parents participate in their children’s exploration of the internet and any online services and use their browser’s parental controls to limit the areas of the internet to which their children have access.

2. Parental Use

It is your responsibility as a user of our website to conduct any necessary background checks or reference checks on any person or resource listed on our site that you might want to hire or to purchase.

3. Your Email Address & Opt-Out Options

We only collect and hold your email address in order to send information and services you have specifically requested and to notify you of new developments, products, services, trainings, events and occasional recommendations for organizations that we feel offer products or services that our customers might find useful.

You can unsubscribe at any time. Every email we send contains contain an “unsubscribe” or opt-out link which you can click to have your name removed from our e-mail list.

If you ever have a problem with your subscription or wish to be completely removed from our contact list feel free to contact Customer Service at karen@empowerdyslexickids.com.

4. Order Forms and Purchases

Our site uses an online order form for you to sign up for and/or purchase information, products, and services. For purchases, we collect your contact information (i.e., mail and e-mail addresses), financial information (i.e., credit card numbers), and demographic information (i.e., zip code, state, country). We use this contact information from the order form to send you a confirmation e-mail for which you cannot opt out. We also use this information to send you your orders, as well as information about our company and products and special promotions.

Your contact information is also used to get in touch with you when necessary for additional information to process or fulfill your order. Financial information that is collected is used to bill for products and services. Financial information is not retained or stored as part of your shopping profile, so you must enter your credit card number each time you place an order.

Unique identifiers are collected from website visitors to verify your identity and for use as account numbers in our record system. Demographic and profile data is also collected at our site. We use this data to help us improve our Web site and our product and service offerings.

The following section has been added to more specifically address GDPR

5. What data do we collect about you?

Personal data means any information capable of identifying an individual. It does not include anonymised data.

We may process certain types of personal data about you as follows:

- a. Identity Data may include your first name and last name.
- b. Contact Data may include your billing address, delivery address, email address and telephone numbers.
- c. Financial Data may include your bank account and payment card details (all encrypted in our system following compliance with PCI DSS).
- d. Transaction Data may include details about payments between us and other details of purchases made by you.
- e. Technical Data may include your login data, internet protocol addresses, browser type and version, browser plug-in types and versions, time zone setting and location, operating system and platform and other technology on the devices you use to access this site.
- f. Profile Data may include your username and password, purchases or orders, your interests,

preferences, feedback, survey, and application responses.

g. Usage Data may include information about how you use our website, products and services.

h. Marketing and Communications Data may include your preferences in receiving marketing communications from us and your communication preferences. We may also process Aggregated Data from your personal data but this data does not reveal your identity and as such in itself is not personal data. An example of this is where we review your Usage Data to work out the percentage of website users using a specific feature of our site. If we link the Aggregated Data with your personal data so that you can be identified from it, then it is treated as personal data.

i. Sensitive Data

We do not collect sensitive data which includes physical or mental health condition as a mandatory field. Parents are given an option to share if their child has a learning difficulty or neurodiversity, but this is not mandatory and is not shared.

6. How personal data is collected

Data is always provided directly by you and is collected a variety of methods including:

a. Direct interactions

You may provide data by filling in forms on our site (or otherwise) or by communicating with us by post, phone, email or otherwise, including when you:

- order our products or services;
- create an account on our site;
- subscribe to our service, training, or publications;
- request resources or marketing be sent to you;
- enter a competition, prize draw, promotion or survey;
- complete a feedback or service request form at our events or events we attend; or
- give us feedback.

b. Automated technologies or interactions: As you use our site, we may automatically collect Technical Data about your equipment, browsing actions and usage patterns. We collect this data by using cookies, server logs and similar technologies. We may also receive Technical Data about you if you visit other websites that use our cookies. Please see our cookie policy below.

c. Third parties or publicly available sources: We may receive personal data about you from various third parties and public sources as set out below:

- Technical Data from the following parties:
 - o analytics providers such as Google based outside the EU;
 - o advertising networks such as Facebook and LinkedIn based inside OR outside the EU; and
 - o search information providers based inside OR outside the EU.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside OR outside the EU.
- Identity and Contact Data from data brokers or aggregators based inside OR outside the EU.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

7. How your personal data is used

We will only use your personal data when legally permitted. The most common uses of your personal data are:

- Where we need to perform the contract between us.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal ground for processing your personal data, other than in relation to sending marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by emailing us at karen@empowerdyslexickids.com.

a. Purposes for processing your personal data

Set out below is a description of the ways we intend to use your personal data and the legal grounds on which we will process such data. We have also explained what our legitimate interests are where relevant.

We may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data. Please email us at karen@empowerdyslexickids.com if you need details about the specific legal ground we are 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 <i>(as defined above in section 2)</i>	Lawful basis for processing
Register as a new customer	(a) Identity (b) Contact	Performance of contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications (f) Business information	(a) and (f) Performance of a contract with you (b) Necessary for our legitimate interests to recover debts owed to us
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to complete a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests to keep our records updated and to study how customers use our products/services

To enable you to participate in a survey, competition, prize drawing	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests to study how customers use our products/services, to develop them and grow our business
To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business <u>reorganisation</u> or group restructuring exercise
		(b) Necessary to comply with a legal obligation
To deliver relevant content and advertisements to you and measure and understand the effectiveness of our advertising	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests to define types of customers for our products and services, to keep our site updated and relevant, to develop our business and to inform our marketing strategy
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests to develop our products/services and grow our business

b. Marketing communications

You will receive marketing communications from us if you have:

1. requested information from us or purchased goods or services from us; or
2. if you provided us with your details and ticked the box at the point of entry of your details for us to send you marketing communications; and
3. in each case, you have not opted out of receiving that marketing.

You can ask us or third parties to stop sending you marketing messages at any time by clicking the unsubscribe link in our emails OR by emailing us at karen@empowerdyslexickids.com at any time.

Where you opt out of receiving our marketing communications, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

c. Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to find out more about how the processing for the new purpose is compatible with the original purpose, please email us at karen@empowerdyslexickids.com. If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing. We may process your personal data without your knowledge or consent where this is required or permitted by law.

8. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above:

- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- Professional service providers including administrators, marketing experts and marketing research agencies.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

9. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We 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 we are legally required to do so.

10. Data Retention

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we 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 we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By policy, we keep basic information about our customers defined as someone who has purchased (financial transaction) our intellectual property (including Contact, Identity, Financial and Transaction Data) for twenty years after they cease being customers for tax purposes and tracking use of intellectual property.

In some circumstances you can ask us to delete your data: see below for further information. If you have purchased our intellectual property you can opt out of receiving all emails, but your contact information associated with the financial transaction cannot be deleted. If you don't agree with this, please don't purchase anything from our company.

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

11. Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please email us at karen@empowerdyslexickids.com.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. We may need to request specific information from you to help us 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. We may also contact you to ask you for further information in relation to your request to speed up our response. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

12. Third Party Links

Our website contains links to other websites, like our partner’s websites or links to booksellers, that may offer information, products or services that our customers might find useful. These sites may request information from you. In such instances, the collection and use of your personal information will be governed by the privacy policy applicable to that site. We do not control the privacy policies, contents or links that appear on these sites. We encourage you to review the privacy policies of any third party sites or services before providing any of them with your personal information.

13. Cookie

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Our cookie policy:

What’s a cookie?

A “cookie” is a piece of information that is stored on your computer’s hard drive and which records how you move your way around a website so that, when you revisit that website, it can present tailored options based on the information stored about your last visit. Cookies can also be used to analyse traffic and for advertising and marketing purposes. Cookies are used by nearly all websites and do not harm your system.

If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings. You can block cookies at any time by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

How do we use cookies?

We use cookies to track your use of our website. This enables us to understand how you use the site and track any patterns with regards how you are using our website. This helps us to develop and improve our website as well as products and/or services in response to what you might need or want.

Cookies are either:

- Session cookies: these are only stored on your computer during your web session and are automatically deleted when you close your browser – they usually store an anonymous session ID allowing you to browse a website without having to log in to each page but they do not collect any personal data from your computer; or
- Persistent cookies: a persistent cookie is stored as a file on your computer and it remains there when you close your web browser. The cookie can be read by the website that created it when you visit that website again. We use persistent cookies for Google Analytics.

Cookies can also be categorized as follows:

- Strictly necessary cookies: These cookies are essential to enable you to use the website effectively, such as when buying a product and/or service, and therefore cannot be turned off. Without these

cookies, the services available to you on our website cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.

- Performance cookies: These cookies enable us to monitor and improve the performance of our website. For example, they allow us to count visits, identify traffic sources and see which parts of the site are most popular.
- Functionality cookies: These cookies allow our website to remember choices you make and provide enhanced features. For instance, we may be able to provide you with news or updates relevant to the services you use. They may also be used to provide services you have requested such as viewing a video or commenting on a blog. The information these cookies collect is usually anonymized.

14. Revisions to this Statement

Our business changes constantly. This privacy statement will change also, and use of information that we gather now is subject to the privacy and security statement in effect at the time of collection. You should check our Web site frequently to see recent changes.