

# **Laughs Last Ltd**

## **Privacy Policy**

### **Introduction**

This policy explains the what, how, and why of the information we collect when you visit our website, or when you use our Services. It also explains the specific ways we use and disclose that information. We take your privacy seriously, and we never sell lists or email addresses.

### **1. Definitions**

These definitions should help you understand this policy. When we say “we”, “us”, “our” or “Data Controllers”, we are referring to Laughs Last Limited whose registered office is Aruna House, King’s Road, Haslemere. We provide Business Consultancy and Interim Management “Services. When we say “Client” we are referring to the person or entity that is registered with us to use the Services or their employees (past current or prospective). A “Subscriber” is anyone who has opted to receive our promotional emails. “Employees” are current, former or prospective members of staff. When we say “you,” we are referring either to a Client, a Subscriber, an Employee or to some other person whose information we have collected from other sources: visits to our Websites; social media platform or public databases. “Personal Information” means any information that identifies or can be used to identify you, directly or indirectly, including, but not limited to, first and last name, date of birth, email address, gender, occupation or other demographic information. “Third Parties” means entities we engage to provide and support the Services.

### **2. Changes**

We may change this Privacy Policy at any time and from time to time. The most recent version of the Privacy Policy is reflected by the version date located at the bottom of this Privacy Policy. All updates and amendments are effective immediately upon notice, which we may give by any means, including, but not limited to, by posting a revised version of this Privacy Policy or other notice on the Website. We encourage you to review this Privacy Policy often to stay informed of changes that may affect you, as your continued use of the Services or Website signifies your continuing consent to be bound by this Privacy Policy. Our electronically or otherwise properly stored copies of this Privacy Policy are each deemed to be the true, complete, valid, authentic, and enforceable copy of the version of this Privacy Policy which were in effect on each respective date you visited the Website.

### **3. Scope**

This Privacy Policy is effective with respect to any data that we have collected, or collect, about and/or from you, according to our business terms.

#### **4. Questions & Concerns**

If you have any questions or comments, or if you want to update, delete, or change any Personal Information we hold, or you have a concern about the way in which we have handled any privacy matter, please [send us a message](#). You may also contact us by post:

Attn. Data Controller

Laughs Last Ltd

Aruna House

2 King's Road

Haslemere

Surrey

GU27 2QA

#### **YOUR INFORMATION**

##### **5. Information We Collect**

- (a) **Information you voluntarily provide to us:** When you sign up for and use the Services, send us an email, download resources, post on our blog, or communicate with us in any way, you are voluntarily giving us information that we collect. That information may include either your name, physical address, email address, IP address, phone number, as well as details including gender, occupation, location, bank details, purchase history, other demographic information and journal information. By giving us this information, you consent to this information being collected, used, disclosed and stored by third party providers, as described in this Privacy Policy.
- (b) **Information we collect automatically:** When you use the Services or browse our Websites, we may collect information about your visit to our Websites, your usage of the Services, and your web browsing. That information may include your IP address, your operating system, your browser ID, your browsing activity, and other information about how you interacted with our Websites or other websites. We may collect this information as a part of log files as well as using cookies or other tracking technologies. Our use of cookies and other tracking technologies is discussed below.

- (c) **List and email information:** We use Mailchimp to manage our Distribution List using a double opt-in process. If a Subscriber chooses to use the 'forward to a friend' (FTF) link in an email campaign we send, it will allow the Subscriber to share our email content with individuals not on our Distribution List. No one is added to any Distribution List as a result of the FTF.
- (d) **Information from your use of our online services:** We may receive information about how and when you use the service, store it in log files or other types of files associated with your account, and link it to other information we collect about you. This information may include, for example, your IP address, time, date, browser used, and actions you have taken within the application. This type of information helps us to improve our Services for both you and for all our users and is particularly useful for monitoring Mailchimp promotional email campaigns.
- (e) **Cookies and tracking:** We and third parties may use various technologies to collect and store information when you use our Services, and this may include using cookies and similar tracking technologies on our Website, such as pixels and web beacons, to analyse trends, administer the website, track users' movements around the website, serve targeted advertisements, and gather demographic information about our user base. Users can control the use of cookies at the individual browser level. Third parties may use cookies or similar tracking technologies to provide you advertising or other content based upon your browsing activities and interests. If you wish to opt out of interest-based advertising click <http://preferences-mgr.truste.com/> (or if located in the European Union click <http://www.youronlinechoices.eu/>). Please note you might continue to receive generic ads. To find out more about cookies and how to manage and delete them, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).
- (f) **Web beacons:** Third Parties may include Web Beacons for in the emails they deliver for us to create reports about how our email campaign performed and what actions our Subscribers took.
- (g) **Information from other sources:** From time to time we may obtain information about you or others from third party sources, such as public databases, social media platforms or data providers. We take steps to ensure that such third parties are legally permitted or required to disclose such information to us. Examples of the information we may receive from other sources include: demographic information, device information (such as IP addresses), location, and online behavioural data (such as information about your use of social media websites, page view information and search results and links). We use this information, alone or in combination with other information (including Personal

Information) we collect, to enhance our ability to provide relevant marketing and content to you and to develop and provide you with more relevant products features, and services.

## **6. Use and Disclosure of Personal Information**

We process personal data where we have one of 4 'lawful bases' (legal reasons) to do so under data protection law:

- 1) The data needs to be processed so that we can fulfil a contract with the individual, or the individual has asked us take specific steps before entering into a contract;
- 2) The data needs to be processed so that we can comply with a legal obligation;
- 3) The data needs to be processed for the legitimate interests of LLLtd or a third party (provided the individual's rights and freedoms are not overridden);
- 4) The individual has freely given clear consent.

### **We use and disclose Personal Information only for the following purposes:**

- (a) **To promote use of our services to you and others.** For example, if we collect your Personal Information when you visit our Website and do not sign up for any of the Services, we may send you an email inviting you to sign up. If you use any of our Services and we think you might benefit from using another Service we offer, we may send you an email about that. You can stop receiving our promotional emails by following the unsubscribe instructions included in every promotional email we send. In addition, we may use information we collect to advertise our Services to you or suggest additional features of our Services that you might consider using. In addition, we may use your Personal Information to advertise our Services to potential or other users like you.
- (b) **To send you informational and promotional content in accordance with your marketing preferences.** You can stop receiving our promotional emails by following the unsubscribe instructions included in every promotional email.
- (c) **To bill and collect money owed to us by our Clients.** This includes sending you emails, invoices, receipts, statements. We use a third party (Paypal) for secure credit card transaction processing. We do not hold or send your credit/debit card information to third parties. We may disclose your personal

information if you violate our Terms of Service: Overdue accounts are passed to our debt collection service.

- (d) **To send you System Alert messages.** For example, we may inform you of temporary or permanent changes to our Services, such as planned outages, new features, version updates, releases, abuse warnings, and changes to our Privacy Policy.
- (e) **To meet legal requirements**
- (f) **To provide information to representatives and advisors**
- (g) **To prosecute and defend a court, arbitration, or similar legal proceeding.**
- (h) **To respond to lawful requests by public authorities, including to meet national security or law enforcement requirements.**
- (i) **To provide, support, and improve the Services we offer.** This includes our use of the data that our Clients provide us or aggregating information from your use of the Services or visit to our Websites.
- (j) **To provide suggestions to you.** This includes using data to suggest products or services that you may be interested in or that may be relevant to you.
- (k) **To transfer your information** in the case of a sale, merger, consolidation, liquidation, reorganization, or acquisition. In that event, any acquirer will be subject to our obligations under this Privacy Policy, including your rights to access and choice. We will notify you of the change either by sending you an email or posting a notice on our Website.

## **7. Public Information and Third-Party Websites**

- (a) **Blog.** We have public blogs and forums on our Websites. Any information you include in a comment may be read, collected, and used by anyone. If your Personal Information appears on our blogs and you want it removed, contact us [here](#). If we are unable to remove your information, we will tell you why.
  - (b) **Social media platforms and widgets.** Our Websites include social media features, such as the Facebook Like button. These features may collect information about your IP address and which page you are visiting on our Website, and they may set a cookie to make sure the feature functions properly. Social media features and widgets are either hosted by a third party or hosted directly on our Website. We also maintain presences on social media platforms including Facebook, Twitter, LinkedIn and Instagram. Any information, communications, or materials you submit to us via a social media
- NEW Laughs Last Privacy Policy from 16th October 2020

platform is done at your own risk without any expectation of privacy. We cannot control the actions of other users of these platforms or the actions of the platforms themselves. Your interactions with those features and platforms are governed by the privacy policies of the companies that provide them.

- (c) Links to third-party websites. Our Websites include links to other websites, whose privacy practices may be different from ours. If you submit Personal Information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any Website you visit.

## 8. Third Parties

We may disclose Personal Information to the following types of third parties for the purposes described in this policy:

- (a) Sometimes, we share your information with our third-party Service Providers, who help us provide and support our Services. Service Providers have separate and independent privacy policies and you should be comfortable with them before you submit any Personal Information.
- DISC By completing an assessment via a link, we sent you by email, you are agreeing to share any reports generated with us and/or our Clients (in the case of recruitment or management support services).
  - We use a distribution list to send promotional emails. Our lists are generated by subscribers opting in via sign up forms on our websites or via social media. The lists are stored on a secure MailChimp server. We do not, under any circumstances, sell our Distribution Lists. We do not use MailChimp to send confidential information.
  - When you visit our website, we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to various parts of the website. The information is only processed in a way which does not identify anyone. To opt-out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>
  - We use Zoom to record conversations: coaching sessions, webinars. We always ask you permission to record sessions and we send you a copy of the recording

- We use SurveyMonkey for online surveys, audits and polls.
- We use Paypal to collect card payments.
- We use Xero cloud-based accounting package to send invoices, statements etc

*This List is Not Exhaustive*

**(b)** Advertising partners. We may partner with third party advertising networks and exchanges to display advertising on our Websites or to manage and serve our advertising on other sites and may share Personal Information with them for this purpose. All third parties with which we share this information are required to use your Personal Information in a manner that is consistent with this policy. We and third parties may use cookies and other tracking technologies, such as pixels and web beacons, to gather information about your activities on our Websites and other sites to provide you with targeted advertising based on your browsing activities and interests.

## **9. Contest and Sweepstakes**

We may, from time to time, offer surveys, contests, sweepstakes, or other promotions on our Websites or through social media (collectively “Our Promotions”). Participation in our Promotions is completely voluntary. Information requested for entry may include personal contact information such as your name, address, date of birth, phone number, email address, username, and similar details. We use the information you provide to administer Our Promotions. We may also, unless prohibited by the Promotion’s rules or law, use the information provided to communicate with you, or other people you select, about our Services. We may share this information with our affiliates and other organizations or Service Providers in line with this policy and the rules posted for the Promotion.

## **SECURITY**

### **10. Notice of Breach of Security**

If a security breach causes an unauthorized intrusion into our systems that materially affects you then we will notify you and the information commissioner’s office as soon as possible and later report the action, we took in response.

## **11. Safeguarding Your Information**

We take reasonable and appropriate measures to protect Personal Information from loss, misuse and unauthorized access, disclosure, alteration and destruction, considering the risks involved in the processing and the nature of the Personal Information.

We do not hold credit/debit card payment information on our systems. All card transactions are managed by our third-party service provider (Paypal) on our behalf.

## **COMPLIANCE**

### **12. Age of Consent**

By using our Websites or subscribing to our distribution lists, you represent that you are at least the age of majority in your state or province of residence, or that you are the age of majority in your state or province of residence and you have given us your consent to allow any of your minor dependents to use this site.

### **13. Where we store data collected via our Websites**

The data that is collected on the web site may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. By using our Websites, you understand and consent to the collection, storage, processing, and transfer of your information to our facilities outside the EEA and those third parties with whom we share it as described in this policy.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

### **14. Accuracy and Retention of Data**

We do our best to keep your data accurate and up to date, to the extent that you provide us with the information we need to do so. If your data changes (for example, if you have a new email address), then



you are responsible for notifying us of those changes. Upon request, we will provide you with information about whether we hold, or process on behalf of a third party, any of your Personal Information. We will retain your information for as long as 2 years after we stop providing you with our Services. We will also retain and use your information to comply with our legal obligations, resolve disputes, prevent abuse, and enforce our Agreements.

## 15. Access & Complaints

As an individual whose personal data is processed by Laughs Last Ltd you have these rights:

- The right to be informed, which is what this privacy policy is for.
- The right to access data we hold about you.
- The right to object to direct marketing. (To exercise this right either use the unsubscribe option or contact us directly.)
- The right to object to processing carried out based on legitimate interests.
- The right to erasure (in some circumstances).
- The right to data portability.
- The right to have your data rectified if it is inaccurate.
- The right to have your data restricted or blocked from processing.

We will give an individual access to any Personal Information we hold about them within 40 days of any request for that information and confirmation of identity. Individuals may request to access, correct, amend or delete information we hold about them by [contacting us here](#). Unless it is prohibited by law, we will remove any Personal Information about an individual that we hold on local or online storage facilities. A small charge of up to £10 may be levied to cover administrative or postage costs associated with accessing personal information. There is no charge for an individual to update their Personal Information.

You have the right to lodge a complaint about our processing with the UK's Information Commissioner's Office (<https://ico.org.uk/>).

Thanks for taking the time to learn about Laughs Last Ltd.'s Privacy Policy.