

## **PRIVACY POLICY**

CLMO Consultancy Limited (**company, we, us** and **our**) respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

### **Purpose of this Privacy Policy**

This privacy policy aims to give you information on how we collect and process your personal data through your use of this website.

This website is not intended for children, and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

### **Who we are and our contact details**

We, CLMO Consulting Limited, are the controller and responsible for your personal data.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details:

Name:	Chloe Oudiz
Phone Number:	07706 192900
E-mail:	<a href="mailto:chloe@divorcewithchloe.com">chloe@divorcewithchloe.com</a>

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## **Changes to the privacy policy and your duty to inform us of changes**

We keep our privacy policy under regular review. This version was last updated on 20 June 2025.

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

## **Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## **The data we 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).

During our provision of the services, we will likely become privy to information or data about yourself, your partner or spouse, children and/or your family, which may be contained in these documents (including but not limited to): session notes produced for the services, emails made available to us, text messages shown to us and/or copies thereof, our customer intake form and the Contract Order Form.

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

- **Identity Data** includes first name, maiden name, last name, username or any similar identifiers, marital status, title, date of birth and gender;
- **Contact Data** includes billing address, delivery address, email address and telephone numbers ;
- **Transaction Data** includes details about payments to and/or from you and other details of services you have purchased from us;

- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website;
- **Financial Data** includes bank account and payment card details;
- **Profile Data** includes username and password, your interests, preferences, feedback and survey responses;
- **Professional History Data** includes details about your work experience, title, current and previous employer;
- **Usage Data** includes information about how you use our website and services; and
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

### **Special Categories of Personal Data**

We may process **Special Category Personal Data** about you. Special Categories of Personal Data includes details racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, data concerning health or data concerning a person's sex life or sexual orientation.

We do not collect any other special category data including information about criminal convictions and offences.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with a product or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## **How your personal data is collected**

**Direct interactions.** Most of the personal information we process is provided to us directly by you when you fill in our forms and/or contract documents, or otherwise by corresponding with us for or during receipt of our services. This includes personal data you provide when you:

- subscribe to our online newsletter;
- apply for our services by completing our Customer Intake form, the Contract Order Form or other relevant documents;
- create an online account;
- apply for a discovery call; or
- give us feedback or contact us.

**Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We may also collect this personal data by using server logs and other similar technologies.

## **How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- **Performance of a contract:** to perform the contract we are about to enter into or have entered into with you.
- **Legitimate interests:** where the processing is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. Our legitimate interests include ensuring that we monitor, analyse, deliver and improve our services to you and your household members; properly managing our business; and promoting our services. We will look to balance your interests with our legitimate interests where we rely on this category.
- **Legal obligation:** where we need to comply with a legal obligation.

- Public interest: where we need to perform a task in the public interest.
- Vital interests: where we need to protect the vital interests (i.e., the health and safety) of you, your family or others.
- Consent: with your express consent (for example in relation to special category data).

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

### **Purposes for which we will use your personal data**

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

Note that 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 contact us 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.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a new customer – this will be done by way of a Customer Intake Form.	(a) Identity (b) Contact	(a) Performance of a contract with you
To book a discovery call.	(a) Identity (b) Contact	(a) Performance of a contract with you
To process and deliver services including managing payments, fees and charges.	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests

	(e) Marketing and Communications	
<p>To manage our relationship with you which will include:</p> <ul style="list-style-type: none"> <li>(a) To provide our coaching services to you</li> <li>(b) Managing how we communicate with you e.g., via our newsletter subscription form</li> <li>(c) Ensuring that we are meeting your needs when delivering our services</li> <li>(d) Notifying you about changes to our terms or privacy policy</li> <li>(e) Asking you to leave a review or take a survey</li> </ul>	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Profile</li> <li>(d) Marketing and Communications</li> </ul>	<ul style="list-style-type: none"> <li>(a) Performance of a contract with you</li> <li>(b) Necessary to comply with a legal obligation</li> <li>(c) Necessary for our legitimate interests (to keep our records updated and to ensure we are meeting your needs when delivering our services)</li> <li>(d) Condition for processing <b>Special Categories of Personal Data</b>: Article 9(2)(a) UK GDPR – Explicit consent</li> </ul>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Technical</li> </ul>	<ul style="list-style-type: none"> <li>(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 reorganisation or group restructuring exercise)</li> <li>(b) Necessary to comply with a legal obligation</li> </ul>
<p>To monitor and record telephone calls between you and us</p>	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> </ul>	<ul style="list-style-type: none"> <li>(a) Necessary for our legitimate interests (to improve the service we deliver)</li> </ul>
<p>To deliver relevant website content and advertisements to you and measure or understand the</p>	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Profile</li> <li>(d) Usage</li> </ul>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop</p>

effectiveness of the advertising we serve to you	(e) Marketing and Communications (f) Technical	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 website updated and relevant, to develop our business and to inform our marketing strategy)
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) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our services and grow our business)

**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 get an explanation as to how the

processing for the new purpose is compatible with the original purpose, please contact us.

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

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

## **Marketing**

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

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

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

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

## **Opting out**

You can ask us to stop sending you marketing communications at any time by following the opt-out links within any marketing communication sent to you or by contacting the DPO.

If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes.

## **Disclosures of your personal data**

We may share your personal data with the parties set out below for the purposes set out in the table above.

- Stripe online payment platform;
- Go Cardless;

- Ella CRM
- Jotform;
- suppliers and service providers to facilitate the provision of the services, including IT consultants, webhosting providers, consultants, for example, to protect the security or integrity of my business, including my systems and for business continuity reasons;
- public authorities where I am required by law to do so;
- any other third party where you have provided your consent.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our 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 our instructions.

### **Data Retention**

We keep all personal information for a period of 6 years. We will then dispose your information.

### **International Transfers**

We do not envisage that we will transfer your personal data outside the UK.

However, if we have to transfer your personal data outside the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.

### **Data security**

We 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, we limit access to your personal data to those employees, agents, contractors

and other third parties who have a business need to know. 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.

## Your Legal Rights

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

**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 we hold about you and to check that we are lawfully processing it.

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

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we 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 we are 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 we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we 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 us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.

- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We 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 us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are 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, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

**No fee usually required**

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 could refuse to comply with your request in these circumstances.

**What we may need from you**

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.

**Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could 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.

### **Third-party links**

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## Complaints

If you have any concerns about our use of your personal information, you can make a complaint to us at [chloe@thedivorceandseparationcoach.com](mailto:chloe@thedivorceandseparationcoach.com).

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:  
Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>