# LIFEARCHITECT.COM PRIVACY POLICY

#### I DATA CONTROLLER

Welcome to the website of IFS THERAPY Ltd. with its registered office at 137 County Road, Walton, Liverpool L4 3QF, United Kingdom ("Data Controller", "IFS THERAPY Ltd.", "we", "us", "our"). IFS THERAPY Ltd. is a private limited company incorporated in accordance with the British law under company number 12488709.

IFS THERAPY Ltd. owns the website under the domain https://www.lifearchitect.com (the "Website"). Through the Website, the Data Controller provides the services ("Services") described in an exhaustive and accessible manner in the <a href="Website's regulations">Website's regulations</a>. The Data Controller acts as a controller of all personal data within the meaning of the GDPR as well as UK GDPR regulations collected and processed in connection with your use of the Website.

All of our activities in the operation of the Website are in compliance with the applicable laws on the protection of personal data, in particular with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC ("GDPR") as well as in accordance with the UK Data Protection Act of 2018 ("UK GDPR").

# **II PURPOSE OF DATA PROCESSING**

We collect and process personal data primarily for the purpose of providing services electronically through the Website and for the performance of the contract concluded for this purpose. In addition, we collect and process data, i.e. information that identifies or at least allows you to be identified as an individual, when you voluntarily choose to contact us or when you choose to receive commercial information from us. Moreover, we collect and process certain technical data generated in connection with your visit to the Website which may also be considered personal data. "Processing" means any operation performed on personal data, such as collecting, recording, organizing, structuring, storing, adapting or modifying, downloading, viewing, using, disclosing by transmission, dissemination or otherwise making available, matching or linking, limiting, deleting or destroying, or any other use.

# **III DATA PROCESSED, RETENTION PERIOD**

We collect various types of data for various purposes related to the provision and improvement of the quality of our Services. The types of information collected and processed depend on the type of services we provide through the Website. We collect and process data in the following situations:

- when you create an account on the Website,
- when you purchase goods or services through the Website,
- when you decide to contact us,
- when you choose to receive commercial information and newsletters from us,
- when you browse the Website.

Providing your personal data is voluntary, but without providing it we will not be able to realize what you expect from us, e.g. we will not be able to contact you, we will not create an account on the Website or we will not execute a contract for the purchase of a service or goods.

Your data will be processed for as long as it is necessary to fulfill the purpose for which it was collected or as long as it is necessary or possible to do so due to certain legal provisions on the processing of personal data.

# 1. Creating an account on the Website

When you choose to create an account on the Website, we will collect and process the following data:

- E-mail address ,
- Name and surname,
- Phone number

The legal basis for the processing of your data for creating an account on the Website is your voluntary consent (legal basis in accordance with section 6(1)(a) of GDPR) and the need for us to perform the concluded contract for the provision of services by electronic means (legal basis according to section 6(1)(b) of GDPR).

Data will be processed until the termination of the concluded contract for the provision of electronic services.

# 2. Purchase of goods and services through the Website

When you choose to purchase goods or services through the Website, and when you use these services, we will collect and process the following data:

- E-mail address,
- Name and surname,
- Phone number,
- Correspondence address,
- Company name, tax ID number (optionally),
- Image (optionally, when using the services)

The legal basis for the processing of your data for creating an account on the Website is your voluntary consent (legal basis in accordance with section 6(1)(a) of GDPR), the need for us to perform the concluded contract for the provision of services by electronic means (legal basis according to section 6(1)(b) of GDPR), the need to comply with legal obligations, e.g. if we have to provide personal data to state authorities and to keep tax books or fulfill tax and accounting obligations (legal basis in accordance with section 6(1)(c) of GDPR) as well as our legitimate interest (legal basis in accordance with section 6(1)(f) of GDPR) to the extent that your image may be processed in recordings of workshops conducted as part of the services we provide.

The data will be processed until the execution of the concluded contract for the provision of services by electronic means, or until it is required by law, e.g. for the fulfillment of tax and accounting obligations.

# 3. Contact with the Data Controller

When you contact us through the Website, such as a result of a complaint, we will collect and process the following data:

- E-mail address ,
- Name and surname,
- Phone number

The legal basis for the processing of your data for creating an account on the Website is your voluntary consent (legal basis in accordance with section 6(1)(a) of GDPR) and the need to comply with legal obligations, i.e. handling of a complaint notification (legal basis in accordance with section 6(1)(c) of GDPR).

The data will be processed until the purpose of the contact request has been achieved or the processing consent has been withdrawn, in any case no longer than three years from the last action taken.

# 4. Receiving commercial information and newsletters

When you choose to receive commercial information and newsletters from us, we will collect and process the following data:

• E-mail address

The legal basis for the processing of your data for creating an account on the Website is your voluntary consent (legal basis in accordance with section 6(1)(a) of GDPR) and our legitimate interest in creating a database with your personal data, aimed at organizing and properly maintaining the newsletter communications sent to you (legal basis in accordance with section 6(1)(f) of GDPR).

Data will be processed until you withdraw your consent to data processing.

#### 5. Browsing the Website

When you view content on the Website, we may also process your data for marketing purposes, i.e. to analyze your behavior on the Website and to optimize the performance of the Website, as well as advertising activities.

In this case, the data is collected and processed for marketing purposes, and the legal basis is our legitimate interest (legal basis in accordance with section 6(1)(f) of GDPR) understood as the desire to reach as many users and customers as possible, to promote our Services and thus develop our business.

Data will be processed as long as the Services are provided, until you object or until you change your browser settings.

#### 6. Analytics

When you use the Service, we may also analyze your actions to improve both the Services and the Website itself, so that you receive the highest quality service. Analytics are performed for two purposes and on the following bases:

- we analyze the data collected during your use of the Services and the Website in order to improve our Services, and the legal basis is our legitimate interest (legal basis in accordance with section 6(1)(f) of GDPR) understood as the need to provide services and products in the highest quality, corresponding to the needs of users, developing the functionality of the software, improving its accuracy and correctness;
- we also analyze the data collected during your use of the Service in order to ensure high standards of quality and security in the operation of the Website.

Data will be processed until:

- you object, change your browser settings,
- the data has a personal character,
- conducting the analysis and achieving the goal,

whichever comes first.

# 7. Prevention of claims and recovery of claims

We may process your personal data in order to assert or defend against possible claims related to the provision of electronic services and the processing is based on legitimate interest (legal basis in accordance with section 6(1)(f) of GDPR) understood as the possibility of asserting or defending against claims.

Data will be processed until the expiration of the statute of limitations for each claim.

# **IV DATA SHARING**

We work with certain third parties who can access the data we collect and process. Among the recipients of your data are:

- 1. entities authorized by law or by authorized request (courts, administrative authorities);
- 2. accounting, IT, marketing, communications, analytical and legal service providers;

- 3. entities handling electronic payments to the extent necessary to handle payments made through the Website, as well as handling any refund of amounts paid;
- 4. subcontractors with whom we work.

Information about you, including your personal data, may also be transferred - and maintained - on devices located outside the European Economic Area, where data protection regulations may differ from those set forth in the GDPR.

If we transfer personal data outside the European Economic Area, in particular to third countries, such transfer will be based on the relevant legal mechanisms such as Commission (EU) Implementing Decisions, standard contractual clauses or other similar legal instruments as specified in GDPR.

# **V YOUR RIGHTS**

You have the following rights under the GDPR:

- 1. The right to request access to your data and to receive a copy of your data: whenever possible, you can access, update or request deletion of your personal data;
- 2. The right to rectify (correct) your data: you have the right to have your information rectified if that information is inaccurate or incomplete;
- 3. The right to erasure: you have a right to erasure regarding data that are no longer required for the original purposes or that are processed unlawfully;
- 4. The right to data portability: you have the right to be provided with a copy of the information we have regarding you in a structured, machine-readable and commonly used format;
- 5. The right to object: you have the right to object to our processing of your personal data upon your justified objection we will cease any further processing under Article 6(1)(f) of the GDPR;
- 6. The right to withdraw consent: you also have the right to withdraw your consent at any time where we relied on your voluntary consent to process your personal information;
- 7. The right to lodge a complaint with the competent supervisory authority about our collection and use of your personal data.

In order to exercise the rights described above, you may send the relevant requests to the e-mail address: hello@lifearchitect.com, send your request by mail to the address indicated above, or submit it in person at our headquarters. Keep in mind that we may ask you to confirm your identity before responding to your request to exercise your rights. Withdrawal of consent to data processing does not affect the lawfulness of data processing on the basis of consent given before its effective withdrawal.

# **VI SECURITY**

The security of your data is an extremely important issue for us. We endeavor, through appropriate technical and organizational measures put in place in our company, to protect your personal data in a constant and meticulous manner against loss, destruction, deformation, any manipulation or unauthorized access and unauthorized sharing of your personal data.

However, it is important to bear in mind that no form of data transmission or maintenance on the Internet is 100% secure. Due to the inherent characteristics of the Internet, we are not able to guarantee that during the transmission or maintenance of data through our system or on our behalf, the data will be secure and free from any infringement by third parties, such as hackers.

We use cookies to track your activity on the Website, and we store some of the information obtained during such tracking.

Cookies are files containing a small amount of information that may contain an anonymous unique identifier. Cookies are sent by our Website to your browser and are stored in the memory of your device. They are used to collect and track information, as well as to analyze and improve the quality of services provided through the Website.

Detailed information can be found in our **Cookies Policy**.

#### VIII AUTOMATED DATA PROCESSING AND PROFILING

Your personal data may be processed by automated means and may be profiled.

You can object to profiling at any time. Please note, however, that profiling will enable us to better match search results and advertisements to your preferences.

From the moment of the objection, we are no longer allowed to process the personal data unless we can demonstrate the existence of compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or grounds for the establishment, assertion or defense of claims.

### IX CHANGES TO THIS PRIVACY POLICY

We may revise this privacy policy from time to time. The most current version of the privacy policy regarding how we process your data will be posted on the Website. By continuing to use the Website and the services we provide through it, if we make changes to the content of this privacy policy, you agree to be bound by the revised content. If you do not agree to the revised content of the privacy policy, you should immediately stop using the Website and the Services available through it, and terminate your contract for the Services provided through it.

## X CONTACT WITH DATA CONTROLLER

You can contact us as follows:

- by e-mail: hello@lifearchitect.com
- in writing to the address of the Data Controller: IFS THERAPY Ltd., 137 County Road, Walton, Liverpool L4 3QF, United Kingdom
- by phone: +48 507 521 501 (EU)