

**PAUSE
GDPR
PRIVACY
POLICY**



2021



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WELCOME TO PAUSE

My name is Saida Goutel and I am the owner and founder of pa-u-se.co.uk. Pa-u-se.co.uk is run as a sole trader company dedicated to Wellbeing via talks, workshops, individual sessions and retreats in UK and France.

My workshops and talks are aimed at organisations or individuals interested (or intrigued) in understanding the science behind breath-work and smiling exercises and how it can foster and enhance a physical, emotional and spiritual balance in the here and now of their lives.

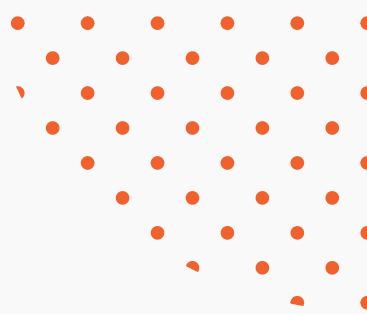
1.PRIVACY POLICY

At Pause, your Privacy is important to us. We value the privacy of everyone who visits this website and We will only collect and use your personal data in ways that are described here, and in a way that is consistent with our legitimate business purposes and your rights in line with the EU General Data Protection Regulation which took effect on 25th May 2018.

Our Privacy Policy will give you a clear description about the way We collect, process and use your personal information.

We strongly encourage our Users to read carefully this Privacy Policy in order to make informed decisions. So your understanding and acceptance of this Privacy Policy is necessary when you decide to contact us for requesting information about our services related to talks, workshops on Breath-Work & Smiling or simply booking a one-to-one session or purchasing one of our products.

We also reserve the right to modify this privacy policy at any time, so please review it from time to time and see if you are satisfied with the changes. However, any changes or updates will be notified on the site so you are fully aware of it.



This Privacy Policy outlines pa-u-se.co.uk Services and Products and the following terms shall have the following meanings:

- Pa-u-se.co.uk is referred to as “Company”, “We”, “Us”, “Services”, “Site or Website”
- By “Content” we mean information, data and documents uploaded and published on the Website.
- By “Users” we mean individuals sharing personal information with Us when requesting information or booking services or purchasing our products and referred as “You”
- By “Events” we mean scheduled talks, workshops or retreats in UK or France.
- By “Services” & “Products” we mean “talks”, “workshops” or “one-to-one sessions”, publications of quotes of pearls of smiles, fake pearls used for meditation, merchandise displaying Pause logo
- (eg: stickers/pens/mug/scarves/cushions/T-shirt etc.)
- By GDPR we mean the EU General Data Protection Regulation.

Needless to say your personal information needs to be processed in order to perform our contractual obligations towards you and providing you with our services as well as protecting our legitimate business interests.

So when you use the Site and ticked the “I agree” box after you entered your details in the contact form; you are explicitly giving us your consent to the collection, storage, disclosure and use of your personal information as described in this Privacy Policy.

2. YOUR INFORMATION - WHAT WE COLLECT

We receive, collect and store any information when you enter on our website, when you complete form, when you provide us with comments/ testimonials, when you email or supply us with information using other channels such as letters, phone calls, text messages or when you contact us via applications (eg: Whatsapp, Instagram, Facebook etc.)

See below examples of the types of personal data about you that We may receive, collect and process:

- Your Personal Identity: this may include at a minimum your title, first name, last name, gender or date of birth.
- Your Contact Details: this may include at a minimum your email address, telephone/mobile number or your postal address.
- Your Financial Data: This may include at a minimum your name, email address, delivery address, billing address, your phone number, and your payment details (eg: debit or credit card number) when paying either for Our Services, Products or in case of refunding.
- Your information posted on Our Site: This may include Personal Information posted by you (including your username, comments, review, pictures etc.)
- Our Mailing List: If you sign up for joining Our mailing lists, We collect at a minimum your email address and/or postal address, phone number.
- Information You Provide About Others: when you refer a friend for Our Services or Products. Such information, may be used to introduce Pa-use.co.uk to the people you refer.
- Your Internet/Technical Data: This may include information when We collect your internet protocol (IP) address used to connect your computer to the Internet, your login data and other technology on the devices you use to access our Website.
- Your Customer History: When you place an order, We collect at a minimum your name, billing address, shipping address, email address, phone number, and payment information (e.g., credit card number).

It also includes your queries and purchase history, as well as your comments about our Services/Products.

- Your Usage Data: We use software tools/applications provided via Wix platform to measure and collect session information (such as length of visits to certain pages or page interaction information)
- Marketing and Communication Materials: This may include information related to Our Services & Products sent to you on your request.
- Collecting Sensitive Personal Data such as:

a) Information about & from Adults

- By accessing and/or using our Site, you may provide us with personal information as described on this page. You acknowledge that you have read and understood our Privacy Policy, which implies the collection, use, storage and disclosure of such personal information.
- When programming Events or private sessions on a one-to-one basis, we may require you complete a personal history questionnaire, which might reveal Sensitive Data (eg: questions about your overall mental and physical health, your dietary requirements)
- Your data can only be processed on the condition that you have given us your explicit consent to fulfil our contract with you.
- In the eventuality you do not provide us with the data We request from you, We may not be able to fulfil our contract and therefore the Service you booked or registered for will have to be cancelled.
- Last but not least, you are solely responsible for your own content (eg : when leaving us a comment, testimonial or a review etc.) by doing so you automatically grant pa-u-se.co.uk a royalty free and license to use, reproduce, modify, translate into French and publish your comment/review etc. to promote our Site

b) Information about & from Children

Definitions of a child sourced from : <https://learning.nspcc.org.uk/>

"The United Nations Convention on the Rights of the Child (UNCRC) defines a child as everyone under 18 unless under the law applicable to the child, majority is attained earlier"

In England, Scotland & Wales

- a child is defined as anyone who has not yet reached their 18th birthday. Child protection guidance points out that even if a child has reached 16 years of age and is:
 - living independently
 - in further education
 - a member of the armed forces
 - in hospital
 - or in custody in the secure estate

"They are still legally children and should be given the same protection and entitlements as any other child" (Department for Education, 2018a)

- At Pause, We take Children's Privacy and Safety very seriously. Our Site is addressed to a general audience and not specifically directed to children. We do not collect information about children or minors whose age is defined by law (see section above about the definition of a child)
- We will NOT authorise any under age individual to contact us via The Site or other channels such as letters, phone calls or text messages in order to book Our Services WITHOUT receiving prior consent by a parent or legal guardian. Similarly, under no circumstances shall We collect or store personal data related to an under age individual WITHOUT receiving prior consent by a parent or legal guardian. In the event We learn that someone under 18 has provided personal information through The Site, the removal of that information from Our database will take immediate effect.
- Similarly, if a parent or guardian becomes aware that his or her child has provided us with Personal information without their consent, he or she must contact us without any delay at saida@pa-u-se.co.uk

3. YOUR INFORMATION – HOW WE COLLECT IT

Pa-u-se.co.uk website was built and designed using Wix.com, a company specialising in providing “customisable high-quality website templates and advanced features that include apps, graphics, image galleries, fonts, vectors, animations and other options (eg: to get a personalised SEO plan to get found online)*

*directly quoted from Wix.com website

We will only use and share your information where it is necessary for Us to carry Our legitimate business activities and provide Our services to You. In order to fulfil Our services, We use different methods to collect data You gave Us or requested from You.

How We Collect Your Information:

a) Collecting Information Directly From You

When you communicate with Us through phone, email, text messages, post or whenever you fill in a form on our Website or emailed to you to give us your personal identity, your contact or bank details.

- When you place a booking/order for our Services/Products.
- When you complete a questionnaire/survey.
- When you subscribe to our newsletter/ weekly videos.
- When you purchase written or visual publications (mindful/spiritual quotes, videos or audios)
- When you email or post us your comment/testimonial.
- When you join our fundraising campaign to support a charity.



b) Collecting Your Information Automatically

- **Your mobile Devices:** We may collect information from your mobile devices to identify your visit to our Website and see the way you interact with us on your devices.
- **Your Location data:** We may solicit your permission to collect your location data to enable the use of some of our Services. Depending on the platform you use to access our Applications (eg: Apple's iOS, Google's Android) you may be able to control the location data via your own device.
- **When you navigate on Our Site:** We may automatically collect Technical Data about your equipment, browsing actions.
- **Cookies:** We collect your personal data by using cookies (for more information about it see section 4)


c) Collecting Your Information From Other Sources

- **Client Information:** We may collect contact information such as name, e-mail, postal address and/or phone number of our business clients and their employees with whom we may interact for the purpose of our business.
- **Social Media Platforms:** We may include IT features that are designed to enable interaction with social platforms such as Whatsapp, Intagram, Youtube etc..) when Users have mobile devices with embedded audio and video players we may collect information about you via this channel and add it to our database.

4. WHAT ARE COOKIES & WHAT THEY DO

By cookies we mean small pieces of data stored on our Site browser. They are typically used to keep track of the settings Users have selected and actions they have taken on a site. Cookies are key to the good functioning of specific IT systems such as:

- To allow you to navigate between pages efficiently .
- To enable automatic activation of certain features.
- To remember and store your preferences.
- To facilitate the interaction between you and our Services and therefore making your interaction quicker and easier .
- To compile statistical data on your use of our Services.
- Our Site uses the following types of cookie via WIX's platform *
(* information is directly source from Wix.com
- Session Cookies: stored only temporarily during a browsing session in order to allow normal use of the system and are deleted from your device when the browser is closed. Bear in mind that blocking or deleting these cookies will not prevent the Site from working. However, if you choose to disable cookies, some features of our Site may not operate properly and your online experience may be limited.
- Persistent Cookies: only read by the Site, saved on your computer for a fixed period and are not deleted when the browser is closed. Such cookies are used where we need to know who you are if you tend to repeat your visits on our Site. These Persistent Cookies will allow us to store your preferences for the next sign-in. They can also help you fill out forms quicker and more easily (eg: contact forms, bookings, refunds, purchase etc.)

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- **Third-Party Cookies:** Information on this site may include embedded content (e.g. videos, images, articles, etc.) The Site also includes Third-Parties' websites whose embedded content behaves in the exact same way, therefore they may collect data about you, use cookies and monitoring/tracing your interaction with the embedded content if you have an account and are logged in to their website. If you leave a comment, the comment and its metadata are retained indefinitely. Please note, We do not physically store data for selling it or sharing it with anyone who is going to manipulate your privacy. To manage this website however, we use 3rd party services - such as Google for analytics or Wix platform for hosting services - that may have access to your data to monitor and analyse our web access.
 - Please see Wix Privacy Policy
<https://www.wix.com/about/privacy>
 - Please see the Google Privacy Policy:
<https://policies.google.com/privacy?hl=en-US>

How To Restrict or Block The Cookies

a. Cookies that are set by Our Site, or any other site can be blocked or restricted by You by going through your browser setting. If You wish to opt-out of third parties - collecting any data regarding your interaction on Our site - you need to visit their websites for further information.

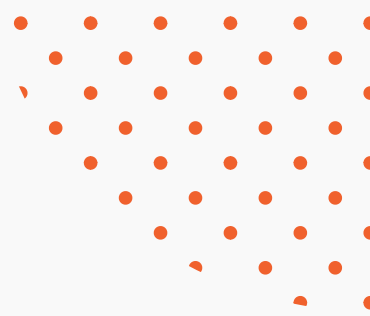
b. Alternatively, you can visit: <https://www.aboutcookies.org/> which contains comprehensive information on how to do this on a wide variety of browsers. You will find general information about cookies and details on how to delete cookies from your machine

5. YOUR INFORMATION & OUR LEGITIMATE PURPOSES

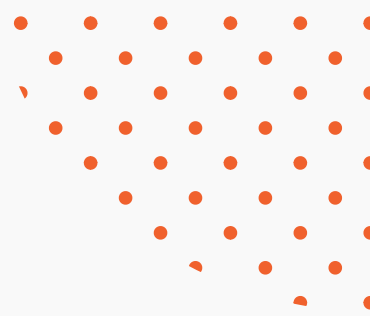
All our communications with you and our business purposes are based on lawful basis processing and legitimate interest as described below:

See table below

Our Purposes & Lawful Processing	Type of Data We Collect	To Whom We sell Personal Information
Notify you regarding your query, your account with us or updates to our terms which goes towards the performance of our Services/Contract with you.	Identity /Contact/ Bank details	None
Include you in Our Mailing List. If you sign up for one of our mailing lists we collect your email address and/or postal address. The purpose of collection and use of this data is that we use your information to perform activities associated with a contract to provide you with products or services.	Identity /Contact	None
Solve issues with your account/your payment which goes towards the performance of our Services and necessary for our legitimate interests.	Identity /Contact/ Financial Data and Transaction Data	None
Resolve a dispute to enable the performance of our services and necessary for our legitimate interests.	Identity /Contact/Purchase and Emails History	None



Collect fees or monies owed which is necessary for our legitimate interests.	Identity /Contact/ Financial Data and Transaction Data	None
Poll your opinions through a review/ questionnaire/ feedback/testimonial, which goes towards checking the performance of our services and act upon your feedback or issues.	Identity /Contact/ Financial Data and Transaction Data	None
Administer and Protect Our Business, to prevent fraud and data breach which is necessary for our legitimate interests and for complying with legal obligations.	Identity /Contact/ Technical/legal obligation	None
Inform you about changes or updates about our Company or to our Terms & Conditions or Privacy Policy which is necessary for our legitimate interests and to fulfil a contract with you.	Identity /Profile/Contact/ Marketing and Communications	None
Send you invitations/ newsletter to future scheduled events/publication which is necessary for our legitimate interests	Identity /Profile/Contact/ Marketing and Communications	None



Provide valid contact information/ addresses if you wish to contact us to access, correct, amend or delete any personal information we store about you. This is necessary to keep on track your customs and records with us.

Identity /Contact/legal obligation

None

Conduct necessary checks on participants' health prior to running workshops /one-to-one sessions to ensure that every single client is fit to participate in the event/sessions. It is both necessary for our legitimate interests and for complying with legal obligations.

Identity/Profile/Contact/Sensitive personal history information/legal obligation

None

Give you explanation on how to withdraw your consent (eg: you don't want us to process your data anymore), which is necessary for legal obligations.

Identity/ Contact/legal obligation

None

Remind you to provide us with specific information when registering and using our Services. It is necessary to do so in order to comply with legal obligations as stipulated under the EU General Data Protection Regulation (GDPR)

Identity/ Contact/legal obligation

None

6. YOUR INFORMATION – USER’S RIGHTS

You may contact us to:

- Request access to your personal data.
- Receive a copy of your personal information.
- Request rectification of your personal information.
- Request erasure of your personal information.
- Object to the sharing of your personal information.
- File a complaint with a supervisory authority.
- Request to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

- If you have booked one of our Services or left comments, you can request to receive an exported file of the personal data we hold about you, including any data you have provided to us.
- You can also request that we erase any personal data we hold about you. This does NOT include any data we are obliged to keep for administrative, legal, or security purposes.
- 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.
- We also retain hard copies of some transactions for (our own) tax purposes.
- 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 also 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.

If you wish to exercise any of the rights listed here above, please contact our Data Protection Controller (“DPC”) using the details provided below:

Saida Goutel at saida@pa-u-se.co.uk

7. YOUR INFORMATION – RETENTION & DISCLOSURE

- We will retain your personal information for as long as necessary to provide our Services, and to comply with our legal obligations and enforce our policies. The duration of the Retention periods will depend on the type of information and the purpose for which we collected it.
- To confirm to applicable laws and regulations, We will keep records of our client's personal data, however, any out-dated, unused data will be destroyed at the earliest and most convenient time.
- We will also make sure that your personal information is kept updated, amended or deleted when it is found incomplete or inaccurate.
- We may disclose information for legal purposes or law enquiries (eg: warrants, court orders) We may also share your information to establish or exercise our rights, to defend against a legal claim, to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our Policies.

8. YOUR INFORMATION & DATA SECURITY

- Your personal data is placed under the security services of our platform host Wix who run their 24/7 security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.
- We have also put in place additional security measures such as limiting access to your personal data to contractors and third parties who have a business with us. They will only process your personal data on our instructions and under full confidentiality.
- You need to be aware that no method of transmission over the Internet, or method of electronic storage, is fully secure. While We take all necessary steps to protect your information from unauthorised access, use, or disclosure, We cannot guarantee the security of your Personal Information and We cannot be held responsible for any illicit action from individuals who perform unauthorised access to our Site. Therefore We cannot give our full warranty that we will prevent such access.
- However, We will inform you of a breach to your Personal Information – as required by law – and We may notify you electronically, in writing or by telephone.
- Needless to say that you are responsible for any access or use of your account/password/device by someone else. In the event you have not authorized such access or use, you should notify us as quickly as possible.

9. YOUR INFORMATION & INTERNATIONAL TRANSFER

- When booking an Event (eg: talks/workshop/trips) held within or outside the European Union, you acknowledge the collection, international transfer, storage, and processing of your information.
- We may be required to transfer your data to our business Partners within or outside the European Union. Their processing of information on our behalf will involve a transfer of data within or outside the EU.
- Whenever, We transfer your personal data within or outside the EU, We ensure that a similar degree of protection is put in place and in line with data protection laws.

10. LINKS TO THIRD PARTY VENDORS

- Pau-u-se.co.uk Site displays a dedicated page to our the links of our Third Party Vendors. "A third-party vendor is a company or entity with a direct written contract to provide products or services to your customers on your organisation's behalf" * quote sourced from <https://securityscorecard.com/product>)
- These links are provided for your information only. We have no control over the contents of sites that We do not own, and hold no responsibility for any loss or damage that may arise when accessing their websites. So We strongly encourage you to check their Terms of Use and Privacy Policies to be clearly informed on how they may use your information.
- Only with your explicit consent, We may share your Personal Information with our Third Party Vendors, and they may contact you by email, telephone, postal mail or other common communication methods with marketing and promotional messages about their products or services. You may also be given the option to receive further communications from our Third Party vendors (for example when you agree to be part of a survey, prize competition or when you book a retreat in UK or France)

11. CODE OF CONDUCT

- All the Content on our Website is provided for general information purposes only and do not claim to be or constitute any legal, medical advice and shall not be relied upon as such.
- The Website and all its content (eg: trade name, logo as well as texts, videos) must be regarded as our property protected under copyright laws. Therefore you agree not to infringe these rights. However, If you wish to make any use of content on our site please contact saida@pa-u-se.co.uk
- We do not guarantee that Our Site is totally error or omission free or that the host server is free of viruses. We will not be liable for any loss or damage caused by a virus due to your use of the Website or to your downloading of any content on it, or on any website linked to it.
- Last but not least, when leaving us a comment or review, you agree to refrain from using inappropriate language. We will not assume liability or endorse your use of the content, which might be a breach to other people's rights. If you post any content or comment that is offensive, provocative on different levels involving racist, sexist, or comments, you will be reported and blocked from further interaction on our Site.

The logo for 'pa||se' is centered at the bottom of the page. It consists of the word 'pa||se' in a white, lowercase, sans-serif font, with two vertical bars between the 'a' and 's'. The text is set against a solid orange circular background.

pa||se