**PRIVACY POLICY**

**Updated June 2nd 2023**

Ladder4Life respects the sensitive nature of any personal information you provide to us via our website: <https://www.ladder4life.com> (“The Website”) and our APP (“Quest”).  We have created this Privacy Policy in order to show our commitment to the privacy of those who use our Website, services or our Quest App. This Privacy Policy describes our online information collection, storage, disclosure practices regarding how your personal information is collected and used by us.  By accessing and using the Website or Quest APP, you consent to the collection, use and disclosure of information through the APP as described in this Privacy Policy.

We reserve the right to change our Privacy Policy at any time.  In the event we make changes to this Privacy Policy, the renewed policy will be re-posted on our Website, clearly dated when such modifications were made. All changes are effective on the date listed at the top of this page and apply to all information that we have about you.  Your continued use of the Site or the services that we provide (such as the Quest APP) after any change is posted indicates your acceptance of the changes and your continued consent to our processing of your personal data. If at any point you do not agree to any portion of this Privacy Policy then: You should immediately stop using the Site and the Services such as the Quest APP. We encourage you to review this Privacy Policy carefully, as it has legal obligations in it.  If you have any concerns or questions about this Privacy Policy or our information collection, storage, disclosure practices, please contact us at Ray.middleton@ladder4life.com

**Personal Information That We Collect and How We Use It**

Ladder4Life collects personal data about you when you visit the Website and sign up for services, such as the free trauma-informed course or other services, such as the Quest APP.  “Personal Information” is information that may be used to directly or indirectly identify you, including your name, email address, phone number or other information about you. The majority of such Personal Information is collected when you use our Services, subscribe to updates, sign up for our mailing list or otherwise provide us with your contact information.  Some of this Personal Information will be required if you wish to partake in the Services that we provide, such as free or paid for training or the Quest APP.

Generally the type of Personal Information we collect includes, but is not limited to:

* Personal Information necessary to use the Services that you have requested, such as accessing training courses or the Quest APP, including establishing an account;

We and our service providers use that data to: (i) enable you to log in to services such as free or paid for training or the Quest APP; (ii) contact you if there is a problem with your account; (iii) provide answers to your inquiries or questions; and (vi) maintain intermittent communication with you as may be necessary to inform you of offers, updates, other information regarding Ladder4Life and its Services.

**Non-Identifiable Data and Aggregated Personal Information**

Regardless of whether you register for an account or submit information to us, Ladder4Life and third parties performing services for us may send "cookies" to your computer.  Cookies are commonly used, small text files placed on your web browser when you visit our Site that store information on your computer, such as Site preferences.  We use cookies as generally used in websites, to keep track of your personal session.  We also use cookies to track your activity on the Site as a unique person.  For security purposes, all of this information is stored in encrypted form.  This data may be used to display information about our Services on websites operated by third parties. Please note, that if you decline to use cookies, you may experience reduced functionality or slower website response times.

Ladder4Life or our service providers, (e.g. Google Analytics) may also collect web surfing data related to your use of the Site.  Such information may include: your Internet Protocol (IP) address, browser type, and internet service provider (ISP); your operating system; which of our web pages you access and how frequently you access them; referral or exit pages; click stream data; and the dates and times that you visit the Site.  This data may be collected using cookies, web beacons, page tags or similar tools.  The same as cookies, web surfing information is anonymous, "click stream" transactional data that is not associated with any users as individuals.

**How and When Your Information Is Shared With Other Parties**

Ladder4Life does not sell, trade or license any Personal Information about its users for marketing purposes. We do not share your Personal Information unless it is necessary to fulfil our responsibilities, such as and including providing information to you (e.g. a free or paid for training course) or services to you, such as use of the Quest APP.

**Additional Sharing of Information**

We keep your Personal Information private and secure and do not routinely share it with other organisations and we do not sell, trade or license any Personal Information about its users for marketing purposes. However, we reserve the right to share it in certain cases that are unlikely to occur and have never occurred thus far given this is a training company. In the unlikely situation we would share personal information; If the law requires it, or we are preventing fraud. We may share your Personal Information with law enforcement or other government agencies as required by the law or for the purposes of limiting fraud. We reserve the right to disclose your Personal Information to protect our rights, or to comply with a legal proceeding, a court order or a legal process. We further reserve the right to disclose any of your Personal Information to take precautions against liability, to investigate and defend against third-party claims/allegations, to protect the security or integrity of the Website, our services, such as training courses or the Quest APP, or to protect the rights, property or personal safety of Ladder4Life, its users, or others.

Notwithstanding any of the above, we will not share your Personal Information if such sharing is prohibited by applicable privacy and data protection law, including, without limitation, the EEA’s General Data Protection Regulation effective May 25, 2018

**Rights of EEA Residents**

This section of the Privacy Policy is applicable to residents of the European Economic Area (“EEA”). The EEA consists of the member states of the European Union, i.e., Austria, Belgium, Bulgaria, Croatia, Republic of Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden and the United Kingdom, and Iceland, Liechtenstein, and Norway. This section also applies to residents of Switzerland and, in the event of its departure from the EU, residents of the United Kingdom. Residents of the EEA and Switzerland are referred to here as “EEA Residents.”

From May 25, 2018, all processing of Personal Information of EEA Residents is performed by A Starting Point in accordance with the General Data Protection Regulation (2016/679) of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons regarding the processing of Personal Information and on the free movement of such data (“GDPR”).

Under the GDPR, A Starting Point is both the controller and a co-processor of the Personal Information of EEA Residents. Ladder4Life’s purpose for collecting and processing Personal Information from EEA Residents is to authenticate user accounts and subscriptions to our mailing lists and to provide marketing information about our Services or access to our services, such as training courses or the Quest APP. The legal basis for collecting Personal Information for subscribing to our email lists is your consent, including during the sign up process. You may withdraw consent for obtaining such communications by following the “Unsubscribe” instructions on any communication or by contacting Ladder4Life at Ray.middleton@ladder4life.com

EEA Residents may obtain information about the Personal Information that Ladder4Life holds about them by contacting Ladder4Life at Ray.middleton@ladder4life.com

**Notifications and Communications from Our Site**

Communications Regarding Our Services

If you provide us with your email, we will send you email notifications and a free newsletter from time to time with suggestions and other information.  Some notifications are communications relating to us and our Services. You may “opt-out” from receiving such communications by following the “Unsubscribe” instructions provided in the email.

Legal or Security Communications

We also may occasionally send out notices that are required for legal or security purposes.  For example, certain notifications are sent for your own protection, or notifications involving changes to legal agreements, such as this Privacy Policy or the Terms of Service.  In general, you may not opt out of such emails.

Account Communications

We may also send communications providing customer support or responses to questions regarding the operation of the Services, such as training courses or the Quest APP. Generally, you may not opt out of such emails.

Deleting Your Information

If you want us to delete your Personal Information and your account, please contact us, Ladder4Life, at Ray.middleton@ladder4life.com with your request. We will take steps to delete your information as soon as we can, but some information may remain in archived/backup copies for our records or as otherwise required by law.

**Personal Information Retention**

We retain the Personal Information we receive as described in this Privacy Policy for as long as you use our Services or as necessary to fulfil the purposes for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

**Links to Other Sites**

If you follow any links that direct you away from the Site, including links to social media sites, among others, this Privacy Policy will not apply to your activity on the other sites you visit. Obviously, we do not control the privacy policies or the privacy practices of any third parties.

**Privacy in Submitted Materials**

If you choose submit any photos or videos to us, including through a social media platform, such as Instagram, such photos or videos may be displayed on the WebSite, including photos / videos of yourself or other individuals.  By submitting such materials you forego any privacy rights in such materials. We will always however explicitly ask you permission and consent to make these public – it could be an interview with you or your feedback about the training programme for example.

**Security Policy**

We take commercially reasonable steps to protect our customers’ Personal Information against unauthorized disclosure and/or loss.  But, no data transmission over the Internet can be guaranteed to be 100% secure.  Thus, while we strive to protect user information we cannot ensure or warrant the security of any information you transmit to us or from the Site.  You engage in such transmissions at your risk.

If you believe your Personal Information is being improperly used by us or any third party, please immediately notify us via email at Ladder4Life, at Ray.middleton@ladder4life.com

**Children Under 13**

No portion of the WebSite is directed to children (under the age of 13). Consequently, we do not knowingly collect personal identifying information from any person we know is a child (under the age of 13). If we learn that we have collected personal information from a child under age 13 we will delete that information as quickly as possible. If you are a parent or guardian of a child and you believe your child has provided us with Personal Information, please contact us at Ladder4Life at Ray.middleton@ladder4life.com And we will delete it.

**Links to Third Party Platforms**

This Site or communications may contain links to third party websites, over which we exercise no control. Except as set forth in this Privacy Policy, we do not share your Personal Data with those third parties and we are not responsible for the privacy policies of any third party or their management of your Personal Information. Because they may treat your Personal Information differently than we do, we suggest you read the privacy policies on those third party websites prior to submitting any Personal Information to such sites you my visit.

In addition, you may be redirected to a third party platform for certain functions (such as to Thinkific to sign up for a course).  *See*section (above) regarding “Additional Sharing of Information.”

**Your Rights and Obligations**

We ask that you keep the Personal Information that you provide to us current and that you correct any information you have provided us by contacting us at Ladder4Life at Ray.middleton@ladder4life.com

You represent that all Personal Information you provide us is true and correct and relates to you and not to any other person you may be pretending to be.

If you are a resident of the EEA and wish to access or correct the Personal Information that Ladder4Life has about you, or have any questions relating to the processing of your Personal Information, please contact us at Ladder4Life at Ray.middleton@ladder4life.com  with the subject line “GDPR Data.”

If you use the Site, you are responsible for maintaining the confidentiality of your account and for restricting access to your computer or device, (.g.for your own safety, not sharing log in with other people), and you agree to accept responsibility for all activities that occur under your account.